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Ottawa

Court File No.:

ONTARIO

SUPERIOR COURT OF JUSTICE

STACY AMIKWABI, SHAWN BRENNAN, GEORGE FAYAD, JOSHUA ALAS-WILSON, ALISA TOJCIC, JANE DOE, JOHN DOE

Plaintiffs

-and-

POPE FRANCIS, THE HOLY SEE, THE STATE OF THE VATICAN, THE SOCIETY OF JESUS, HM QUEEN ELIZABETH II, THE ORDER OF THE GARTER, THE HOUSE OF WINDSOR (FORMERLY SAXE COBOURG GOTHA), GLOBAL VACCINE ALLIANCE (GAVI), the UN's WORLD HEALTH ORGANIZATION/PUBLIC HEALTH ORGANIZATION OF CANADA, BILL AND MELINDA GATES FOUNDATION, PRIME MINISTER JUSTIN TRUDEAU, DR. THERESA TAM, PREMIER DOUG FORD, CHRISTINE ELLIOTT, MAYOR JIM WATSON, ATTORNEY GENERAL OF CANADA, THE ATTORNEY GENERAL FOR ONTARIO

Defendants

Proceeding under the *Class Proceedings Act, 1992*

STATEMENT OF CLAIM

TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiffs. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a statement of defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiff's lawyer or, where the Plaintiff does not have a lawyer, serve it on the

Plaintiff, and file it, with proof of service in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a Statement of Defence, you may serve and file a Notice of Intent to defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date .... Issued by ....

Local registrar

Address of
Court office...

....

TO POPE FRANCIS on behalf of The Holy See and The State of the Vatican
Apostolic Nunciature
724 Manor Ave.,
Ottawa, Ontario K1M 0E3
Tel: (613) 746-4914
Fx: (613) 746-4786

AND TO THE SOCIETY OF JESUS,
Sacred Heart House
43 Queen's Park Cres E
Toronto, Ontario M5S 2C3
Tel: (416) 962-4500
Fx: (416) 962-4501

AND TO HM QUEEN ELIZABETH II, on behalf of THE ORDER OF THE GARTER, THE HOUSE OF WINDSOR (FORMERLY SAXE COBOURG GOTHA), care of the USHER OF THE BLACK ROD
J. Greg Peters
Usher of the Black Rod
Parliament Hill Centre Block, Room 168-N
Ottawa, Ontario K1A 0A4
Tel: (613) 992-8483

AND TO GLOBAL VACCINE ALLIANCE (GAVI),
2099 Pennsylvania Ave, NW
Suite 200
Washington DC 20006
Tel: (202) 478-1050
Fx: (202) 478-1060

AND TO the UN's WORLD HEALTH ORGANIZATION
Pan American Health Organization
Department on Emergency Preparedness and Disaster Relief
525 Twenty-third Street, N.W.
Washington, D.C. 20037, U.S.A.
Tel: (202) 974-3399
Fax: (202) 775-4578

AND TO PUBLIC HEALTH ORGANIZATION OF CANADA
130 Colonnade Road
A.L. 6501H
Ottawa, Ontario K1A 0K9

AND TO BILL AND MELINDA GATES FOUNDATION,
440 5th Ave N.
Seattle, WA 98109

AND TO PRIME MINISTER JUSTIN TRUDEAU
Office of the Prime Minister
80 Wellington Street
Ottawa, Ontario K1A 0A2
Fx: (613) 941-6900

AND TO DR. THERESA TAM, care of the PUBLIC HEALTH AGENCY OF CANADA
Chief Public Health Officer
Tel: (613)954-8524
Email: phac.cpho-acsp.aspc@canada.ca

AND TO PREMIER DOUG FORD,
Office of the Premier
Legislative Building
Queen's Park
Toronto, Ontario M7A 1A1

AND TO CHRISTINE ELLIOTT,
Ministry of Health
5th Floor
777 Bay St.
Toronto, Ontario M7A 2J3
Tel: (416) 327-4300
Fx: (416) 326-1571

AND TO MAYOR JIM WATSON,
110 Laurier Avenue West
Ottawa, Ontario K1P 1J1
Tel: (613) 580-2496
Fx: (613) 580-2509

AND TO ATTORNEY GENERAL OF CANADA
Department of Justice Canada
Constitutional, Administrative and International Law Section
Ontario Regional Office
120 Adelaide Street West, Suite #400
Toronto, Ontario M5H 1T1
Fx: (416) 954-8982
Tel: (416) 973-0942

AND TO THE ATTORNEY GENERAL FOR ONTARIO
Crown Law office, Constitutional Law Branch
720 Bay St.
Toronto, Ontario M7A 2S9
Tel: (416) 326-4460
Fx: (416) 326-4401

CLAIM

1. The Plaintiffs and Class Members, claim on behalf of themselves and others similarly situated in Canada;

   a) An interim declaration on the lawfulness of the Federal, Provincial and Municipal Governments, or member(s) therein, to unilaterally adopt international recommendations, guidelines and standards advanced, orchestrated and endorsed by the World Health Organization and its affiliates, concerning the Covid-19 global pandemic;

   b) An interim declaration determining under which division of power, either s. 91 or s. 92 of the *Constitution Act, 1867,* the emergency health and welfare of the Canadian public is found. Confusion over the constitutional authority to suspend and infringe fundamental rights and freedoms based on an assumed global pandemic, requires a declaration on where the constitutional authority derives;

   c) A declaration pursuant to s. 24(1) of the Canadian *Charter of Rights and Freedoms* that damages have occurred to the Plaintiffs and Class Members as a result of the suspension and infringement of fundamental rights and freedoms found within the actions of the Federal, Provincial and Municipal Governments, or member(s) therein;

   d) A declaration that the Covid-19 protocols require immediate independent and transparent judicial oversight in order to gather, review and consider unbiased risk analysis to better understand the attendant risks in the epidemiology of the Covid-19 virus;

e) A declaration pursuant to s. 52(1) of the *Constitution Act, 1982*, that any legislation or regulations invoked by the Federal, Provincial or Municipal Governments, or member(s) therein, that are found to be inconsistent with the *Constitution Act*, to the extent of the inconsistency, be found to be of no force or effect;

f) An order certifying this proceeding as a class proceeding under the *Class Proceedings Act, 1992* and appointing the named Plaintiffs as representative Plaintiffs for the proposed classes;

g) Due to the urgency of the issues, the Plaintiffs and Class Members serve Notice pursuant to s. 15(1) of the *Crown Liability and proceedings Act* as against the Province at the issuance of the claim. Any damages sought will be suspended until the 60-day Notice provision set out in s. 18(1) has been satisfied.

h) Pecuniary and special damages in the amount of $1,000,000 for each Class Member following a trial on the common issues;

i) Non-pecuniary damages in the amount to be assessed for every class member following a trial on the common issues;

j) Punitive, aggravated and exemplary damages in the amount of $35 Billion;

k) Costs of distributing all moneys received to Class Members;

l) Prejudgement interest in the amount of 10% compounded annually or as otherwise awarded by this Honourable Court;

m) Costs on a substantial indemnity basis, plus applicable taxes; and

n) Such further and other relief as this Honourable Court may deem just.

2. In bringing this action on behalf of all persons resident in Canada whose fundamental rights and freedoms have been suspended and/or infringed by the questionable and high-risk actions of the Federal, Provincial and Municipal Governments under the rubric of emergency Covid-19 response to a global pandemic declared by the World Health Organization, the Plaintiffs and Class Members plead and rely upon the provisions of the *Class Proceedings Act, 1992*, S.O. 1992, c. 6, *Crown Liability and Proceedings Act*, R.S.C., 1985, c. C-50, and the Ontario *Crown Liability and Proceedings Act*, 2019, S.O. 2019 c. 7.

NATURE OF THE ACTION

3. This is a proposed class proceeding for damages and declaratory relief arising from the Defendant Federal, Provincial and Municipal Governments vicarious liability in unequivocally adopting international guidelines and recommendations put forward by the World Health Organization through Orders-In-Council without lawful authority and due process on behalf of the mind, body and health of the Canadian public.

4. By implementing international guidelines and recommendations through legislation, the Defendant Federal, Provincial and Municipal Governments, or member(s) therein, suspended and infringed the Plaintiffs and Class Members fundamental rights and freedoms as set out in the Canadian *Charter of Rights and Freedoms*, without justification, resulting in harms and damages available pursuant to s. 24(1).

5. The Defendants are vicariously liable for knowingly and willfully advancing, promoting, adopting and manufacturing Covid-19 protocols, task force response and medical protocols which violate terms and provisions of the *Crimes Against Humanity and War Crimes Act*,

(S.C. 2000, c. 24) under the rubric of a state of emergency that is both unconstitutional and unlawful.

PARTIES

PLAINTIFFS – PROPOSED REPRESENATIVE PLAINTIFFS AND CLASS MEMBERS

Stacy Amikwabi

6. The Plaintiff, Stacy Amikwabi is a Sovereign Anishinabe Amikwa Algonquin person who resides on a reserve known as Henvey Inlet First Nation (1854), but which is actually French River Indian Reserve No. 13 (Rowan Proclamation 1852). Stacy Amikwabi and his wife make a living operating a small convenience store on the reserve which has been economically devastated by lockdown and other protocols introduced on the reserve by the federal government through its chief and band council. Stacy Amikwabi and his family will be faced with mandatory vaccines, they have all been advised that restrictions will be imposed for those who do not take the vaccine. Absent clinical education, diagnosis and medical opinion. Stacey Amikwabi and his family cannot provide informed consent to an "experimental gene therapy", namely the mRNA inoculation, which was supposedly developed and administered in response to COVID-19 cases elsewhere. Absent proper medical and scientific information, Stacy Amikwabi and his family do not know if reported COVID-19 cases meet the criteria for the declaration of a pandemic. Due to obvious censorship and suppression of the opinion, which does not accept the world-wide propaganda of a pandemic, Stacy Amikwabi cannot provide an informed consent for an "experimental gene therapy". Stacy Amikwabi stands as representative of all the Indigenous peoples harmed by the imposition of protocols and measures that are an over-

reaction to sets of data produced, manipulated and distributed in an effort to argue the existence of a pandemic.

Shawn Brennan

7. The Plaintiff, Shawn Brennan, is an entrepreneur living in Peterborough, Ontario. Shawn Brennan & business have been nearly devastated by the impact of protocols and regulations that are unsupported by proper scientific and medical research. Shawn Brennan's family unit has been put under incredible stress due to the fear that is engendered by the inflation and manipulation of death statistics, in this country and throughout the world. Shawn Brennan stands as a representative for small business owners with families who have been harmed by these protocols and regulations.

George Fayad

8. The Plaintiff, George Fayad, is a small garage owner who resides in Ottawa, Ontario. George Fayad's business has been adversely affected by the lockdowns, protocols and regulations. George Fayad stands as representative of all business owners who have been harmed by the protocols and regulations.

Joshua Alas-Wilson

9. The Plaintiff, Joshua Alas-Wilson, is a young adult living in Balderson, Ontario. Joshua Alas-Wilson, has Williams Syndrome, a genetic disorder characterized by cognitive delay, developmental delay, anxiety, and intermittent depression. As a person who has difficulty forming lasting bonds with peers due to the characteristics of his syndrome, he manages by attending weekly social gatherings, community socialization, and volunteering at a nursing home. Due to the restrictions put in place because of covid-19, he can no longer

attend his weekly gatherings, walk freely in the community socializing, and volunteer at the nursing home. This has created extreme feelings of isolation manifesting as extreme anxiety causing periodic heart palpitations and depression. Joshua Alas-Wilson has been yelled at, made to feel uncomfortable, and questioned due to his inability to wear a mask. His doctor-supported inability to wear a mask has severely limited all social contact, which then pushed him to seek social interactions via the internet where he then experienced bullying, harassment, and hurt. Joshua Alas-Wilson stands as representative for all persons with “special needs” who have been harmed by the covid-19 protocols and regulations.

Alisa Tojcic

10. The Plaintiff, Alisa Tojcic, is a single mom of three young children living downtown Toronto on social assistance. Ms. Tojcic and her children were in their home for 57 days during the first lockdown. They live in an apartment with no balcony and all building patios and playground were closed around them. Her former spouse delivered groceries to keep the kids safe. The children were terrified and Ms. Tojcic was having panic attacks because as a family they struggle with health issues and she was scared they wouldn’t be provided with care if needed. The Plaintiff also had dislocated ribs and couldn't see her chiropractor or pick up her youngest child who was still nursing. Her oldest got a concussion on March 1, 2020 and was confined to her room as the family couldn't go anywhere to find out if she was stable. Furthermore, the family relies on public transit and was completely stranded during the first lockdown. In August and September the Plaintiff and her middle child had health complications and the stress from the "pandemic" only exacerbated them. Ms. Tojcic saved all her money and bought a van so that she and her children are not trapped in the

downtown core for the next lockdown. Alisa Tojcic stands as representative for all single parents and children who have been harmed by the covid-19 protocols and regulations.

Jane Doe

11. The Plaintiff, Jane Doe, is a mother who gave birth since the implementation of the Covid-19 protocols and regulations. Her experience has her alone in the delivery room and without her child after the birth. She is forced into complete separation from the experience of birth without informed consent due to the imposition of Covid-19 protocols and regulations. Jane Doe stands as representative for all new mothers since March 12, 2020, and their children, who have been harmed by the Covid-19 protocols and regulations.

John Doe

12. The Plaintiff, John Doe, is a construction worker in the Ottawa area. The Ministry of Labour is starting to issue fines for violating Covid-19 safety protocols for not observing physical distancing or wearing of face coverings. A redacted $880.00 ticket was circulated in the industry in order to emphasize the threat. Employees are faced with the fear of receiving a substantial ticket over the need for workplace safety. In some cases, the income received for the day is less or equal to the amount of the ticket leaving some feeling as though they have no choice. Just as the warning states, "becoming complacent can be costly." John Doe stands as representative for all persons who have been harmed by the Covid-19 protocols and regulations and the enforcement thereof by the issuing of tickets and fines.

DEFENDANTS

The Pope of Rome

13. The Defendant, Pope Francis, is the Roman Pontiff, chief pastor of the worldwide Catholic Church and Head of the Holy See. Pope Francis resides in and governs affairs from the Vatican City State. Pope Francis, born Jorge Mario Bergoglio was elected the 266th Pope in March 2013. He is Jesuit, a member of the Society of Jesus. On October 3, 2020, the Pope issued the Encyclical letter "*Fratelli Tutti*" (Brothers ALL) wherein he recommended all the nations give up their sovereignty to one world government and a New World Order.[1] The Pope avails himself of the *Concession of King John of 1213* and is knowledgeable regarding the manipulations of the Society of Jesus throughout history since its inception in 1534 and in particular during the First World War, the Spanish Flu and the Second World War.

The Holy See

14. The Holy See maintains diplomatic relations with other sovereign states and those foreign embassies accredited to the Holy See, to enable the Pope to exercise universal authority worldwide. The Holy See establishes inter-civilian diplomacy by signing treaties and concordat which govern relations between the Papacy and other entities. These set of inter-civilization documents are being signed by the pontiff. The diplomatic representatives of the Holy See, including in Canada, are the Pope's ambassadors called "nuncio."[2]

The State of the Vatican

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[1] Vatican City, The Holy Father Francis. Encyclical Letter *FRATELLI TUTTI* ON FRATERNITY AND SOCIAL FRIENDSHIP. THE HOLY FATHER FRANCIS. ENCYCLICAL LETTER, 3 October 2020, from: http://www.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20201003_enciclica-fratelli-tutti.html.

[2] Boris Vukićević,"Diplomacy of the Holy See in the Transformative Era of Pope Francis", in: *Revista Brasileira de Polititica Internacional*, vol.58 no.2, Brasília Jan. 2016; Vatican City, Holy See Press Office, "Vatican Diplomacy" in: *Vatican Information Service*, 11 April 1997, retrieved from: http://www.catholic-pages.com/vatican/diplomacy.asp.

15. The Defendant, the State of the Vatican, came into existence on February 11th, 1929 by the *Lateran Treaty* between the Holy See and Italy.[3] The seat of the Holy See (Sancta Sedes) is the Vatican City State. It is a state that belongs to the Holy See, and is the seat of the episcopal jurisdiction and of the central government of the Catholic Church.[4] Vatican City is worth untold billions and houses many documents which should be shared with humanity. This state is knowledgeable about the misdeeds and manipulation of the Society of Jesus since its inception in 1534 until the present.

The Society of Jesus

16. The Society of Jesus was constituted on Ascension of Mary day (15 August) in 1534, in the chapel of Notre-Dame de Montmarte. The terms chosen by Pope Paul III to describe this new order in his Bull of Authorization, which were: "*Regimen Ecclesiac Militants*" (The Regime of the Ecclesiac Military).[5] From the Secret History of the Jesuits, Edmond Paris observed:[6]

> *[…]in Europe , wherever Rome's interest required the people to rise against their king, or if these temporal princes had taken decisions embarrassing for the church", the Curia knew she would not find more able, cunning or daring agents outside the Society of Jesus when it came to intrigue, propaganda or even open rebellion.*

And further in the same book:

> *It is the same way as today, the 33,000 official members of the Society operate all over the world in the capacity of […] personnel, officers of a truly secret army containing in its ranks heads of political parties, high ranking officials, generals, magistrate, physician, faculty professor etc […] all of them are still striving to bring*

[3] The Vatican Official Website: https://vatican.com/The-Lateran-Treaty/
[4] Holy See Press Office, "Vatican Diplomacy" in: *Vatican Information Service*, 11 April 1997, retrieved from: http://www.catholic-pages.com/vatican/diplomacy.asp; Vatican City, "The Lateran Treaty", published by *Vatican.com* 5/17/2018
[5] The Jesuits in Canada Official Website: https://jesuits.ca/about-us/who-are-the-jesuits/
[6] Edmond Paris, *The Secret History of the Jesuits*, 1983.

about, in their own space, "Opus Dei, God's work", in reality the plans of the Director General and the papacy.

Queen Elizabeth II

17. Pursuant to Section 9 of the *British North America Act*, 1867, "the Executive Government and authority of and over Canada is hereby declared to continue and be vested in the Queen."[7] This premise is encapsulated in the requirement that the Queen give Royal Ascent to our legislative documents passed before a properly constituted Parliamentary Assembly. In this regard, the Dominion of Canada has not abrogated from the BNA, 1867 nor has Her Majesty Queen Elizabeth II renounced to be the royal sovereign of Canada. Furthermore, by virtue of Section 15 of the *British North America Act*, 1867, Her Majesty Queen Elizabeth II is also the head of the Federal task force on Covid-19 after an active military officer was appointed by the Federal Government, or member(s) therein.

18. Her Majesty Queen Elizabeth II is of the House of Windsor, formally Saxe-Coburg-Gotha. Her Majesty is the head of the Royal Order of the Garter and her Secretary in Canada is the Usher of the Black Rod.

Order of the Garter

19. The Order of the Garter was founded by Edward II, King of England in 1348 to protect himself with an elite group of landowners against the common people.[8] The symbol of the Order includes the motto "*Honi soit qui mal y pense*" – "shame on him who thinks evil of it." The same symbol and motto can be found throughout Canada on government buildings

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[7] W. H. Connell, BNA Sec. 9, in: *Commentary on The British North America Act*, in: Macmillan Canada. Toronto, 1977.

[8] College of St. George, The Order of the Garter: https://www.stgeorges-windsor.org/about-st-georges/history/the-order-of-the-garter/

and courthouses. The Plaintiffs' submit that the Order of the Garter shares responsibility for influencing the global elitist agenda which continues to unravel in these unprecedented times.[9] As a member of the Commonwealth Nations of the British Empire, Canada is implicated in the decisions and relationships that are supported and advanced by the Order of the Garter as the global agenda unfolds.

The House of Windsor

20. The House of Windsor came into being in 1917, when the name was adopted as the British Royal Family Official name by a proclamation of King George II replacing the historic name of Saxe-Cobourg-Gotha which denotes the family's German ancestor.[10] Through the House of Windsor the royal family has familial ties with most of the Monarchs of Europe.

Global Alliance for Vaccines and Immunizations (GAVI)

21. In 2000 Bill Gates stepped down as Microsoft CEO and created the "Gates Foundation"[11] and (along with other parties) launched the "Global Alliance for Vaccines and Immunization" [herein after 'GAVI'].[12] As of July 29, 2020, the Bill and Melinda Gates Foundation has committed over US$4.1 Billion to GAVI.[13] Canada is a long-term member of GAVI and has been a member of its board since inception. GAVI alliance parties are: UNICEF, World Health Organization, World Bank, and The Bill and Melinda Gates Foundation. GAVI was essential in developing the Covid-19 Global Vaccine Access Facility (Covax Facility aka GAVI Covax AMC) to address "unprecedented challenges"

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[9] College of St. George, St. George's House, Annual Lectures: https://www.stgeorgeshouse.org/lectures/annual-lecture/previous-annual-lectures/
[10] https://www.royal.uk/house-windsor.
[11] https://www.gatesfoundation.org/Who-We-Are/General-Information/History.
[12] https://www.gavi.org/history-gavi.
[13] https://www.gavi.org/operating-model/gavis-partnership-model/bill-melinda-gates-foundation.

that were created by the WHO's decision to declare a global pandemic. GAVI Covax AMC sponsors manufacturers who wish "*to invest in vaccine candidates in advance of their licensure*."[14] To date, Canada has provided $1 Billion in funding directly to GAVI.[15]

22. On December 14, 2020, Karina Gould (Canada's Minister of International Development) announced that Canada will contribute a further C$255 million (US$200 million) to the Coalition for Epidemic Preparedness Innovations [hereafter 'CEPI']. This coalition is a global partnership that was formed between public, private, philanthropic, and civil society organisations that have met and organized through GAVI to cement the grip of the global elites and multinational corporations on the public health by targeting unsuspecting citizens in Canada and the worldwide.[16]

23. Operating as a public–private global health partnership, the ultimate goals of these networking partnerships is to further the corporate global agenda of the participating corporations, by lobbying governments and international organizations to implement policies in their favour. This happens at the expense of the citizens in participating countries, and thus, also of Canadians.

24. In this scheme, funds are diverted from national budgets to finance projects of pharmaceutical corporations under the umbrella of GAVI *et al.*, but solely for the profit of those corporations. These GAVI projects are then propagated worldwide through a special partnership with the World Health Organization to expand influence and sources of profit.

World Health Organization (WHO) and the Public Health Agency of Canada

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[14] GAVI-The Vaccine Alliance. *The GAVI COVAX AMC-An Investment Opportunity*. Prospect for potential investors from: www.gavi.org.

[15] Official Website: https://www.gavi.org/investing-gavi/funding/donor-profiles/canada.

[16] CEPI News. Canada boosts funding for CEPI's COVID-19 vaccine research. December 14, 2020. https://cepi.net/news_cepi/canada-boosts-funding-for-cepis-covid-19-vaccine-research/.

25. The Constitution of the World Health Organization [hereinafter 'WHO'] came into force on April 7, 1948 and its primary role was to direct and coordinate international health within the United Nations System.[17] In January 2010, Bill Gates pledged $10 Billion in funding for the World Health Organization and announced, "The Decade of Vaccines". Gates and GAVI are the second and third largest funder of the WHO after the US. Government, which recently pulled its funding through President Trump. Pursuant to the International Health Regulations (IHR 2005) each World Health Organization member state must designate a National Focal Point (NFP). The NFP is accessible at all times for communications with the WHO concerning global public health risks. The International Health Regulation NFP for Canada is located at the Public Health Agency of Canada (PHAC). On that basis, this agency follows the directions of the World Health Organization, not the Government of Canada.

Bill and Melinda Gates Foundation

26. American legal restrictions prohibit the Bill and Melinda Gates Foundation ("Foundation") from explicitly engaging in normative lobbying. Therefore, the Foundation is serving its intended beneficiaries in the capacity of advocacy; first as a catalyst for resource mobilization, and second as an illuminator of scientific innovation.[18] This idea of resource mobilization and scientific innovation involve the promotion of not yet fully developed vaccines and the testing of new vaccines on populations, especially children and young adults in Africa, delivered under the mandates of the United Nations or its organizations like the WHO or UNICEF. The Foundation "was only the second-largest funder of WHO

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[17] https://www.who.int/about/who-we-are/history.
[18] Michael Stevenson. *Agency Through Adaptation* (2014), pp. 236-237.

at US$531 million. This was more than the U.K. contribution of $392 million, and second only to the United States at $873 million".[19]

27. In an article in the Pastors Chronicles, the following headline appears: "UN vaccines sterilize 500,000 women in Kenya". The article went on to say, as follows:[20]

> *Billionaire Bill Gates really like helping people from poor countries get vaccinated. But many are saying his motives may not be all that pure. In fact many believe that this globalist, along with the United Nations, is conducting a massive depopulation effort*

As the Agence de Presse Africaine reported from Kenya:[21]

> *Odinga said girls and women aged between 14 and 49 from the fastest growing populations in the country will not have children, because of a state-sponsored sterilization exercise that was sold to the country as a tetanus vaccination.*

And in the first article above:

> *At the time, the catholic church in Kenya claimed that the tetanus vaccine used by the government of Kenya and UN agencies was contaminated with a hormone (HCG) that can cause miscarriages and render some women sterile.*

Bill and Melinda Gates Foundation is actively supporting an agenda of genocide and crimes against humanity through their inoculation programs, in Canada and abroad, that turn a blind-eye to reasoned risk-analysis resulting in the subjection of innocent civilians to experimental drug programs without proper authority and due process.

Prime Minister Justin Trudeau

28. The Defendant, Justin Trudeau is the current Prime Minister of Canada. At his last appearance at the United Nations he spoke of the "Great Reset" agenda being pushed on

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[19] "Trump And WHO: How Much Does The U.S. Give? What's The Impact Of A Halt In Funding?," NPR.org, April 15, 2020; Lee Harding, "Gates, WHO, and Abortion Vaccines", in *Frontiers Centre for Public Policy*, July 19, 2020.
[20] "UN Vaccines Sterilize 500,000 Women in Kenya" in: *The Pastors Chronicles*, December 8, 2018.
[21] Raila Odinga "Tetanus vaccination is a mass sterilization on women", September 12th 2017, https://www.standardmedia.co.ke/kenya/article/2001254261/raila-tetanus-vaccination-is-a-mass-sterilization-on-women.

humanity by elite oligarch, drug companies, big tech and the World Economic Forum.[22] The Prime Minister of Canada is not acting within his lawful authority on behalf of the Federal Government by adopting and advancing through Orders-In-Council, recommendations of an international organization without due process. The Prime Minister of Canada is relying blindly on the advice and guidance of international organizations to suspend fundamental rights and freedoms. This is based on biased and unsound medical and scientific data. The Prime Minister is acting outside of his Constitutional authority and outside of his office as Prime Minister of Canada.

29. The Prime Minister and his cabinet have invited into Canada the World Health Organization and large pharmaceutical companies whose ethics are being brought into direct question based on a history of genocide and eugenics. Pfizer paid 2.3 Billion dollars on September 2, 2009 to the U.S. Justice Department, for the largest health care fraud settlement in the history of the Department of Justice.[23]

Dr. Theresa Tam, Canada Chief Public Health Officer

30. The Defendant, Dr. Theresa Tam, is Canada's Chief Public Health Officer and as such, is a holder of public office. Dr. Tam is also one of seven members of the Independent Oversight and Advisory Committee for the World Health Organization's Health Emergencies Program.[24] The Defendant's relationship to the Federal Government, or

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[22] Sustainable Development Officinal Website: https://sustainabledevelopment.un.org/memberstates/canada
[23] U.S. Department of Justice. Office of Public Affairs. "Justice Department Announces Largest Health Care Fraud Settlement in Its History: Pfizer to Pay $2.3 Billion for Fraudulent Marketing". September 2, 2009.
[24] World Health Organization Official Website: https://www.who.int/about/who_reform/emergency-capacities/oversight-committee/theresa-tam/en/

member(s) therein, and the World Health Organization suggests a conflict of interest that requires transparency and oversight in light of the issues before the Court.

Premier of Ontario Doug Ford

31. The Defendant Doug Ford, is the current Premier of Ontario, and as such is a holder of public office. The Premier of Ontario adopted the recommendations of the World Health Organization and declared a state of emergency. Subsequently, the Premier has advanced the implementation of actions, laws, and regulations, which have resulted in harms to the general public on the basis of unquestioned scientific and medical opinions put forward by the World Health Organization and its affiliates. The Premier is responsible for adopting principles based on international organizations that suspend and infringe the fundamental rights and freedoms of the Canadian public. Isolation is defined as torture and qualifies as a crime against humanity.

Christine Elliott –Minister of Health and Long Term Care

32. The Defendant Christine Elliott, is the current Minister of Health and Long Term Care. During a conversation caught on camera between Dr. Barbara Yaffe, Associate Chief Medical Office of Health and Dr. David Williams, Ontario's Chief Medical Officer of Health, recorded in the Parliament of Ontario Press Room, the following exchange occurred, wherein Barbara Yaffe exclaimed:[25]

> *I don't know why I bring all those papers. I never look at them," I just say whatever they write down for me.*

[25] Dr. David Williams, Ontario's chief medical officer of health, and Dr. Barbara Yaffe, associate chief medical officer of health, provides COVID-19 update, on: Ontario Parliament WATCH LIVE.

33. The Plaintiffs' submit that as Minister of Health and Long Term Care, the Defendant holds a duty to the Plaintiffs' and the Canadian Public in general, that requires due diligence in her public office and responsibilities.

City of Ottawa – Mayor Jim Watson

34. The Mayor of the City of Ottawa, Jim Watson, oversees the Municipal Regulations on the COVID-19 measures and is liable for harms directly associated with the implementation and enforcement of the Covid-19 protocols and measures undertaken.

Attorney General of Canada

35. The Defendant, Attorney General of Canada, is constitutionally the Chief Legal Officer for Canada. The Attorney General of Canada is a public office holder and is required to be named as a Defendant in any action for declaratory relief. The Attorney General of Canada statutorily and constitutionally liable for the acts and omissions of officials.

The Attorney General for Ontario

36. The Defendant, Attorney General for Ontario, is the Chief Legal Officer of the Province of Ontario. The Attorney General for Ontario is a public office holder and is required to be named as a Defendant in any action for declaratory relief. The Attorney General for Ontario statutorily and constitutionally liable for the acts and omissions of officials.

INJUNCTIVE DECLARATORY RELIEF

37. The Plaintiffs and Class Members submit that Canada is in a state of constitutional crisis. Fundamental rights and freedoms are being usurped by the Federal, Provincial and Municipal Governments, or member(s) therein, without constitutional authority or due

process. Questionable and high-risk actions concerning the mind, body and health of the Canadian public are being supported and advanced by all levels of Government, or member(s) therein, under the rubric of emergency response to a global pandemic declared by the World Health Organization.[26]

38. The implications of these actions have yet to be considered on a constitutional basis. In this regard, the Plaintiffs and Class Members are submitting that fundamental rights and freedoms protected by the Canadian *Charter of Rights and Freedoms*[27] are implicated in this case. Also, and more importantly, the constitutional authority of the Federal Government, or member(s) therein, to unquestionably adhere to the recommendation of the World Health Organization to declare a global pandemic is without lawful authority.

39. Furthermore, the Plaintiffs and Class Members submit that under customary international law, to which Canada is bound by precedent, no international treaty, convention, covenant, principle or law has unquestionable adoptive authority into the domestic common law of Canada.[28] If it is to be considered at all, due process is required for formal implementation by legislation before a full assembly of Parliament. In light of the foregoing, the Plaintiffs and Class Members submit that the constitutional authority of the current Governments, or member(s) therein, to act on behalf of the Canadian public is sufficiently in question to have the matter put urgently, and on interim basis, before this Honourable Court for injunctive declaratory relief.

Jurisdiction for Interim Relief

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[26] Federal Order-In-Council: P.C. Number 2020-0157 and Ontario Order-In-Council: 518/2020

[27] Canadian *Charter of Rights and Freedoms*, s 7, Part 1 of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11

[28] See *Nevsun Resources Ltd. v. Araya*, 2020 SCC 5 (S.C.C.); *R. v. Hape*, 2007 SCC 26 (S.C.C.) at para 39, 43-44; *Baker v. Canada (Minister of Citizenship & Immigration),* 1999 SCC 699 (S.C.C.) at para 80.

40. Pursuant to Section 21(1) of the *Crown Liability and Proceedings Act*,[29] and Section 17 of the *Federal Courts Act*,[30] the Superior Court for Ontario has concurrent jurisdiction to hear the matters set out within the claim.[31]

41. Pursuant to Section 22(1) of the *Crown Liability and Proceedings Act* [hereinafter *CLPA*],[32] and Section 22(3) of the Ontario *Crown Liability and Proceedings Act*,[33] this Honourable Court has the authority to grant interim declaratory rights of the Plaintiffs and Class Members as against the Federal, Provincial, and Municipal Governments, or member(s) therein. It is submitted that interim declaratory relief is necessary in this case as the administration of justice and public interest and security is at stake.

42. The Plaintiffs and Class Members submit that this Honorable Court not only has the authority to grant the relief requested herein[34], it also has discretion to interpret, apply and find relief based on the principles of natural justice and common law that flow beneath the legislated immunities, recently amended or otherwise, for bringing claims against the Government, or member(s) therein.[35]

Grounds for Declaratory Relief – Constitutional Crisis

43. By way of interim motion pursuant to s. 22(1) of the *CLPA*, the Plaintiffs and Class Members seek to bring into question the authority of the Federal, Provincial and Municipal Government, or member(s) therein, to act on behalf of, and in the interest of, the Canadian

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[29] R.S., 1985, c. C-50, s. 1; 1990, c. 8, s. 21.
[30] R.S.C., 1985, c. F-7.
[31] *Babington-Browne v Canada (Attorney General)*, 2016 ONCA 549 (Ont. C.A.); *Fabrikant v A.G. Canada*, 2020 ONSC 7799 (Ont. Sup. Ct.); *Canada (Attorney General) v TeleZone Inc.*, 2010 SCC 62 (S.C.C.)
[32] *Supra note* 2.
[33] 2019, S.O. 2019, c. 7, Sched. 17.
[34] *Gumbs v Grant*, 2000 CarswellOnt 2380 (Ont. Sup. Ct.) at para 26.
[35] *Francis v Ontario*, 2020 ONSC 1644 (Ont. Sup. Ct.)

public based on the declaration of a pandemic by the World Health Organization as set out in the Order-In-Council dated March 18, 2020.[36]

44. Based on the aforementioned recommendation by the World Health Organization, a pandemic was declared in Canada resulting in the implementation of Covid-19 emergency response legislation, regulations, protocols, and propaganda which continue to expand and build momentum by the day.

45. The emergency response protocols and subsequent mind, body and health interventions that have developed and evolved since the declaration on March 18, 2020, have been forced onto the Canadian public without any legal or constitutional grounding. These protocols, the use of propaganda and the vaccination rollout directly impact the Plaintiffs' and Class Members' fundamental rights and freedoms as legislated in the Canadian *Charter of Rights and Freedoms*, and enshrined in common law with the Magna Carta of 1215, its confirmation in 1297, in the Bill of Rights, 1689, and its enduring reflections in customary international law. The harms associated with the response of the Governments, or member(s) therein, are easily established as either infringing or suspending fundamental

[36] P.C. Number 2020-0157:

Whereas the Governor in Council is of the opinion that

(a) based on the declaration of a pandemic by the World Health Organisation, there is an outbreak of a communicable disease, namely COVID-19 coronavirus disease, in the majority of foreign countries;

(b) the introduction or spread of the disease would pose an imminent and severe risk to public health in Canada;

(c) the entry of persons into Canada who have recently been in a foreign country may introduce or contribute to the spread of the disease in Canada; and

(d) no reasonable alternatives to prevent the introduction or spread of the disease are available;

Therefore, Her Excellency the Governor General in Council, on the recommendation of the Minister of Health, pursuant to section 58 of the *Quarantine Act*, makes the annexed *Minimizing the Risk of Exposure to COVID-19 Coronavirus Disease in Canada Order (Prohibition of Entry into Canada)*.

rights of the Plaintiffs and Class Members and the Canadian public in general, resulting in a number of associated and enumerated harms as set out below.

46. In light of the gravity of the rights at stake and the subsequent harms claimed by the Plaintiffs and Class Members below, it is submitted that in order for the Governments, or member(s) therein, to legislate outside of those rights and freedoms, lawful constitutional authority and due process must be considered and adhered to.

47. In order to fully understand the Plaintiffs' and Class Members' position, a brief review of Canada's unique constitutional relationship as a member of the Commonwealth Nations of the British Empire, is essential.

The English Common Law and the Constitutionalism of Canada

48. Canada's commonwealth status as a loyal subject of the British Empire is enshrined in the *British North America Act, 1867*, 30-31 Vict., c.3 (UK). The Preamble reads,

> An Act for the Union of Canada, Nova Scotia, and New Brunswick, and the Government thereof; and for Purposes connected therewith.
>
> *[29th March 1867]*
>
> Whereas the Provinces of Canada, Nova Scotia, and New Brunswick have expressed their Desire to be federally united into One Dominion ***under the Crown of the United Kingdom of Great Britain and Ireland, with a Constitution similar in Principle to that of the United Kingdom***:
>
> ***And whereas such a Union would conduce to the Welfare of the Provinces and promote the Interests of the British Empire***:
>
> And whereas on the Establishment of the Union by Authority of Parliament it is expedient, not only that the Constitution of the Legislative Authority in the Dominion be provided for, but also that the Nature of the Executive Government therein be declared:
>
> And whereas it is expedient that Provision be made for the eventual Admission into the Union of other Parts of British North America:
>
> Be it therefore enacted and declared by the Queen's most Excellent Majesty, by and with the Advice and Consent of the Lords Spiritual and Temporal, and Commons,

> in this present Parliament assembled, and by the Authority of the same, as follows: [Emphasis added]

49. Furthermore, Section 9 of the *B.N.A. Act* states,

> The Executive Government and Authority of and over Canada is hereby declared to continue and be vested in the Queen.

Since then, the Executive Powers of the Queen have been confirmed in all Constitutional Documents for Canada. Therefore, we find exactly the same phrase:

> The Executive Government and Authority of and over Canada is hereby declared to continue and be vested in the Queen.

stated in Section 9 of the current version of the Act, and published by the Department of Justice as of 10 January 2021.[37]

50. Also, Section 52(1) of the *Canadian Charter of Rights and Freedoms, Constitution Act, 1982*, sets out in the "Constitutional Supremacy Clause", that:[38]

> **52.** (1) The Constitution of Canada is the supreme law of Canada, and any law that is inconsistent with the provisions of the Constitution is, to the extent of the inconsistency, of no force or effect.
> (2) The Constitution of Canada includes
> (*a*) the *Canada Act 1982*, including this Act;
> (*b*) the Acts and orders referred to in the schedule; and
> (*c*) any amendment to any Act or order referred to in paragraph (*a*) or (*b*).
> (3) Amendments to the Constitution of Canada shall be made only in accordance with the authority contained in the Constitution of Canada.

51. Based on the foregoing, the Plaintiffs and Class Members submit that the *Constitution Act* of Canada is not in fact where our sovereign constitution resides; rather it resides with the British Empire and rights and freedoms granted since the Magna Carta of 1215. By sovereign constitution, the Plaintiffs and Class Members refer to the underlying foundation

[37] Government of Canada, Laws of Canada webpage, Constitutional Documents, Constitution Acts, 1867 to1982, https://laws-lois.justice.gc.ca/eng/Const//page-1.html#docCont, .

[38] Government of Canada, Laws of Canada webpage, Constitutional Documents, Constitution Acts, 1867 to1982, Canadian Charter of Rights and Freedoms, 1982, https://laws-lois.justice.gc.ca/eng/const/page-15.html.

and principles, which are derived from its unique relationship to the British Empire, on which Canada is built and remains established.

52. The Magna Carta of 1215, granted by King John at Runnymede, enshrined the principles underlying the common law that had begun to be enunciated in the *Assize of Clarendon* of 1166. Sec. 14 of that "Great Charter" of English liberties (1215) provided that "no aid or assessment […] would be granted to the king without summoning of a common council of the kingdom." The whole tenor of the Magna Carta was that the king could not govern arbitrarily by abusing his royal prerogatives, but must act "according to law in the making" in which the *common council* comprised of the subjects of the kingdom would participate.[39] The modern version of such law-making "common council" within the British Commonwealth, and thus Canadian system, is the Parliament.

53. At the time, the common law evolved as a means to oversee the hand of the King by court decisions creating precedents allowing for adaptation to changing circumstances and evolving law. It were violations of common law rights that caused England to develop constitutions to codify certain common law rights that had been infringed.[40] It is the first known law to have asserted that a King, was not above the law.

54. On that basis, the Plaintiffs and Class Members submit, there is no legal principle that would support the notion that the United Nations or the World Health Organization have the statutory or legislative power of a 'common council" similar to that of the parliament within the Constitutional system in Canada, nor that these institutions are above the laws that the "common councils" of the parliaments have enacted any Common Law jurisdiction. Chapters 39 and 40 of the Magna Carta guarantees forever the liberty, justice

[39] McConnell, *supra note* 7 at p. 4.
[40] Magna Carta 1215/ 1216, British Library, London (UK), Chapter 39-40.

and due process of law; the same rights Article 29 of the *UN Declaration of Human Rights*[41] attempts to abolish, along with its counterparts, the *European Convention on Human Rights*[42] and *International Covenant on Civil and Political Rights*.[43]

55. The Magna Carta of 1215 was a treaty between the Barons and the King. It was subsequently re-issued into Statute law in 1297 by King Edward I, proclaiming in the introductory text, which remains the law of the land, that: *"these Liberties following, to be kept in our Kingdom of England for ever."* And in Article 1 that,

> We have granted also, and given to all the Freemen of our Realm, for Us and our Heirs for ever, these Liberties under-written, to have and to hold to them and their Heirs, of Us and our Heirs for ever.[44]

56. Article 29 (XXIX) of the Magna Carta is the most important law still in force in the United Kingdom as it clearly renders arbitrary coronavirus lockdowns unlawful. The provision sets out,

> Imprisonment, &c. contrary to Law. Administration of Justice." States that: "NO Freeman shall be taken or imprisoned, or be disseised of his Freehold, or Liberties, or free Customs, or be outlawed, or exiled, or any other wise destroyed; nor will We not pass upon him, nor deal with him [condemn him,] but by lawful judgement of his Peers, or by the Law of the Land. We will sell to no man, we will not deny or defer to any man either Justice or Right."

57. Article 29 of the Magna Carta of 1297 remains the law of the land in the United Kingdom and the Crown Dependencies and its principles remain the foundation of all common law countries. The Magna Carta was confirmed by Chapter VII of the *English Petition of Rights*

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[41] United Nations. (1998). *The Universal Declaration of Human Rights, 1948-1998*. New York: United Nations Dept. of Public Information
[42] Council of Europe., & Council of Europe. (1952). *The European convention on human rights*. Strasbourg: Directorate of Information
[43] The United Nations General Assembly. 1966. "International Covenant on Civil and Political Rights." Treaty Series 999 (December)
[44] *Magna Carta (1297),*1297 CHAPTER 9 25 Edw 1 cc 1 9 29 at Article 1.

(1627),[45] which remains law in the United Kingdom to present-day. As a member of the British Commonwealth, the English common law as enshrined in the *Magna Carta* of 1297, is the principled foundation of the Canadian *Charter of Rights and Freedoms* and is the ultimate law of the land. Any derogation of those fundamental rights and freedoms, or the arbitrary exclusion of the "common council" - the Parliament - in making those laws, is unlawful and without authority if rights and freedoms are suspended or infringed in the absence of due process.

58. The Supreme Court of Canada in *Reference re Secession of Quebec*,[46] spoke at length about democracy and what it meant in Canada. The following paragraphs emphasize the principles underlying the common law system in Canada and how those principles are applied and upheld through democracy and the Rule of Law;

> The evolution of our democratic tradition can be traced back to the *Magna Carta* (1215) and before, through the long struggle for Parliamentary supremacy which culminated in the English *Bill of Rights* in 1688, the emergence of representative political institutions in the colonial era, the development of responsible government in the 19th century, and eventually, the achievement of Confederation itself in 1867. "[T]he Canadian tradition" the majority of this Court held in *Reference re Provincial Electoral Boundaries*, [1991] 2 S.C.R. 158 (S.C.C.), at p. 186, is "one of evolutionary democracy moving in uneven steps toward the goal of universal suffrage and more effective representation". Since Confederation, efforts to extend the franchise to those unjustly excluded from participation in our political system — such as women, minorities, and aboriginal peoples — have continued, with some success, to the present day.
>
> Democracy is not simply concerned with the process of government. On the contrary, as suggested in *Switzman v. Elbling, supra*, at p. 306, democracy is fundamentally connected to substantive goals, most importantly, the promotion of self-government. Democracy accommodates cultural and group identities: *Reference re Provincial Electoral Boundaries*, at p. 188. Put another way, a sovereign people exercises its right to self-government through the democratic process. In considering the scope and purpose of the *Charter*, the Court in *R. v. Oakes*, [1986] 1 S.C.R. 103 (S.C.C.), articulated some of the values inherent in the notion of democracy (at p. 136):
>
> > The Court must be guided by the values and principles essential to a free and democratic society which I believe to embody, to name but a few, respect for the inherent dignity of the human person, commitment to social justice and equality, accommodation of a wide variety of beliefs, respect for cultural and group

[45] The Petition of Right [1627], 1627 CHAPTER 1 3 Cha 1.
[46] 1998 CarswellNat 1299 (S.C.C.).

identity, and faith in social and political institutions which enhance the participation of individuals and groups in society.[47]

The consent of the governed is a value that is basic to our understanding of a free and democratic society. Yet democracy in any real sense of the word cannot exist without the rule of law. It is the law that creates the framework within which the "sovereign will"is to be ascertained and implemented. To be accorded legitimacy, democratic institutions must rest, ultimately, on a legal foundation. That is, they must allow for the participation of, and accountability to, the people, through public institutions created under the Constitution. Equally, however, a system of government cannot survive through adherence to the law alone. A political system must also possess legitimacy, and in our political culture, that requires an interaction between the rule of law and the democratic principle. The system must be capable of reflecting the aspirations of the people. But there is more. Our law's claim to legitimacy also rests on an appeal to moral values, many of which are imbedded in our constitutional structure. It would be a grave mistake to equate legitimacy with the "sovereign will"or majority rule alone, to the exclusion of other constitutional values.

Finally, we highlight that a functioning democracy requires a continuous process of discussion. The Constitution mandates government by democratic legislatures, and an executive accountable to them, "resting ultimately on public opinion reached by discussion and the interplay of ideas" (*Saumur v. Quebec (City)*, *supra*, at p. 330). At both the federal and provincial level, by its very nature, the need to build majorities necessitates compromise, negotiation, and deliberation. No one has a monopoly on truth, and our system is predicated on the faith that in the marketplace of ideas, the best solutions to public problems will rise to the top. Inevitably, there will be dissenting voices. A democratic system of government is committed to considering those dissenting voices, and seeking to acknowledge and address those voices in the laws by which all in the community must live.[48]

The constitutionalism principle bears considerable similarity to the rule of law, although they are not identical. The essence of constitutionalism in Canada is embodied in s. 52(1) of the *Constitution Act, 1982*, which provides that "[t]he Constitution of Canada is the supreme law of Canada, and any law that is inconsistent with the provisions of the Constitution is, to the extent of the inconsistency, of no force or effect." Simply put, the constitutionalism principle requires that all government action comply with the Constitution. The rule of law principle requires that all government action must comply with the law, including the Constitution. This Court has noted on several occasions that with the adoption of the *Charter*, the Canadian system of government was transformed to a significant extent from a system of Parliamentary supremacy to one of constitutional supremacy. The Constitution binds all governments, both federal and provincial, including the executive branch (*Operation Dismantle Inc. v. R.*, [1985] 1 S.C.R. 441 (S.C.C.), at p. 455). They may not transgress its provisions: indeed, their sole claim to exercise lawful authority rests in the powers allocated to them under the Constitution, and can come from no other source.

An understanding of the scope and importance of the principles of the rule of law and constitutionalism is aided by acknowledging explicitly why a constitution is entrenched beyond the reach of simple majority rule. There are three overlapping reasons.

First, a constitution may provide an added safeguard for fundamental human rights and individual freedoms which might otherwise be susceptible to government interference. Although democratic government is generally solicitous of those rights, there are occasions

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47 *Ibid,* at paras 63-64.
48 *Ibid,* at paras 67-68.

> when the majority will be tempted to ignore fundamental rights in order to accomplish collective goals more easily or effectively. Constitutional entrenchment ensures that those rights will be given due regard and protection. Second, a constitution may seek to ensure that vulnerable minority groups are endowed with the institutions and rights necessary to maintain and promote their identities against the assimilative pressures of the majority. And third, a constitution may provide for a division of political power that allocates political power amongst different levels of government. That purpose would be defeated if one of those democratically elected levels of government could usurp the powers of the other simply by exercising its legislative power to allocate additional political power to itself unilaterally.[49]
> …
> It might be objected, then, that constitutionalism is therefore incompatible with democratic government. This would be an erroneous view. Constitutionalism facilitates — indeed, makes possible — a democratic political system by creating an orderly framework within which people may make political decisions. Viewed correctly, constitutionalism and the rule of law are not in conflict with democracy; rather, they are essential to it. Without that relationship, the political will upon which democratic decisions are taken would itself be undermined.[50]

59. In this instance, the Plaintiffs and Class Members submit that the Federal, Provincial and Municipal Governments of Canada, or member(s) therein, have suspended fundamental rights and freedoms that are the foundation of the democratic system as expressed, by the adoption and imposition of international standards set out by the World Health Organization and the United Nations without legal authority and due process. The Plaintiffs and Class Members submit that this is fundamentally flawed and requires the immediate intervention and oversight of this Honourable Court.

Legislative Authority

60. Plaintiffs and Class Members submit that the Federal, Provincial, and Municipal Government, or member(s) therein, lack lawful authority to use and apply the World Health Organization's recommendation and guidance to declare a pandemic across Canada and Ontario, on at least two grounds sufficient to give cause for urgent interim judicial intervention;

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[49] *Ibid,* at paras. 72-74.
[50] *Ibid,* at para 78.

i. The unequivocal adoption of the World Health Organization's recommendation to declare a pandemic which includes adherence to international instruments that justify the suspension of human rights without oversight or due process, is unlawful.[51]

It is well-established law that the adoption and application of international treaties, covenants, agreements, principles or guidelines have no legal basis in our domestic common law if they have not been directly legislated into law by due process; the foundation of the English common law prohibits it.[52]

ii. Pursuant to the distribution of powers under sections 91 and 92 of the *Constitution Act*, the question of which head of power the health and welfare of Canadians falls under in these unprecedented times is not clear.

The Plaintiffs submit that there is a live issue on the question of the constitutional viability of the actions of the Federal, Provincial and Municipal Governments, or member(s) therein. As the health and welfare of the Canadian public is an overlapping division of power, the national and international concerns of the Covid-19 emergency response raises this issue to the forefront.

Historical Overview

61. In 1309 the Commons granted a subsidy to the King under the condition that illegal extensions of jurisdictions of the King's officers without the "Commons'" approval were

[51] ECHR Article 15 & ICCPR Article 4 – allows the suspension of human rights during an emergency – these are the basis for the Level 5 and 6 guidance and Pandemic Preparedness Publications by the WHO that set out clearly the steps that are desired for the '6-foot distancing protocol'. Article 29 of the UN Charter proposes no method for scrutiny of accountability and ICCPR Artlcle 4.1 only has an equality clause.

[52] *Nevsun, Hape* and *Baker, supra note* 28.

to be discontinued. In 1322, King Edward II confirmed that ordinances should receive "the assent of the Prelates, earls, barons, and commonality of the realm", and that henceforth, any legislation without the parliamentary assent were illegal.[53]

62. Under Edward II.'s successors, and by multiple legislative acts since, the fundamental principle of English common law jurisdiction that the "commonality of the realm" is represented in a Commons or parliament, is an organic continuity in the unbroken tradition of English constitutional history.[54]

63. After the Glorious Revolution of 1688, the principles set out in earlier Declarations of Rights were formalized by statute with the enactment of the Bill of Rights, 1689.

64. Most importantly, the Bill of Rights, 1689, declared that the King's suspending power (nullifying the laws) without the consent of the parliament, was illegal; and the dispensing power (exempting from the application of the law while the law is still intact) was abolished absolutely.[55]

65. While the right to petition the King/ Queen, the right to bear arms, and the free election of members of parliament were affirmed and the principle of freedom of speech, and of debate and proceedings in parliament, was upheld, it was also declared that cruel or unusual punishment should not be imposed.[56]

66. The Bill of Rights, 1689, still "constitutes one of the great landmarks defining the relation of parliament to the Crown"[57] in the British Commonwealth to this very day.

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[53] McConnell, *supra note* 7, at p. 5.
[54] McConnell, *supra note* 7, at p. 5.
[55] *Ibid.. at para* 5.
[56] McConnell, *supra note* 7, at p. 5.
[57] *Ibid.. at para* 5.

67. Considering the enduring powers of the British Constitutional framework in Canada, and recognizing that valid Canadian laws can therefore, only be purported at the inception of the parliament, the single-handed adoption of recommendations from the World Health Organization without the parliamentary debate and legislation, lacks legal authority and is unlawful under the Constitutional laws of Canada.

68. The World Health Organization is not a faction in the Canadian parliament, part of the Constitutional Monarchy in Canada, or an institution governing the statutory or legal affairs in Canada. Thus, the World Health Organization cannot propose or incept any legislation in Canada.

69. The Plaintiffs and Class Members submit that when politicians bypass Parliament and the Legislature to pronounce emergency measures based on "a pandemic declared by the World Health Organization", they commit acts designed to exempt parliamentary debate specifically forbidden by the English Bill of Rights in 1689.

Due Process

70. The most troubling issue before this Honourable Court is the complete lack of due process which has resulted in the breakdown of the Plaintiffs and Class Members' confidence in the Governments, or member(s) therein, to uphold their fundamental rights in a fair, transparent and constitutional manner as was intended by Canada's common law democratic system.

71. Due process is the foundation of democracy and the basis on which freedoms have, and continue to be, fought. It is the principle that makes the Courts arbiters of the rights and freedoms of the Canadian people as against the democratic system.

72. In this instance, due process is complex and involves a deep understanding of Canada's relationship to the British Empire, not only as a Commonwealth Nation but also as an 'Economic Ally' on the global stage.

73. Although the following facts may appear incomprehensible to this Honourable Court, it is respectfully submitted that it should not deter from the truth of the facts submitted. History can be a puzzle, but sometimes the facts align and offer such a clear footprint that although it may seem untenable, the truth of which cannot be denied.

74. The Plaintiffs and Class Members put forward the following summary of historical facts in order assist this Honourable Court in understanding the complexity of the system in place and at issue, in order to assess the grounds for both interim declaratory relief and consideration of the Plaintiffs and Class Members claim as a whole.

Historical Overview

75. On May 15, 1213, King John the 1st, in a Concession to Pope Innocent III, gave over the sovereignty of Great Britain and Ireland, paying an annual stipend for Great Britain and Ireland, and binding his heirs and successors in perpetuity.[58] Today, Her Majesty Queen Elizabeth II reports to the Pope of Rome and pays the annual stipend, as will her heirs and successors.

76. In 1880,[59] the Rothschilds, a well-known and highly visible and successful banking family, began their relationship with the Pope, and Vatican, by endorsing a large loan. It is submitted that the Plaintiffs and Class Members will establish on a full record, that this

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[58] Concession of King John to Pope Innocent III, 1213, Stubb's *Charters*, p. 284, translated in Ernest F. Henderson, , *Select Historical Documents of the Middle Ages*, (London: George Bell, 1910), pp. 430-431. Online: https://sourcebooks.fordham.edu/source/john1a.asp.

[59] Gerald Posner (2015). "[2] The Last Pope King". *God's Bankers: A History of Money and Power at the Vatican*. Simon and Schuster. p. 12. ISBN 978-1416576570

financial relationship has underscored global politics and the economy since its inception. Expert evidence will be put before this Honourable Court illustrating with fact, that together, the Rothschilds and the Vatican own the Bank of America and Merrill Lynch, among many other shared holdings with other oligarch families, such as the Rockefellers.

77. The Society of Jesus was incorporated by Ignatius of Loyola in 1534 in Paris.[60] The constitution of the Society of Jesus remained secret until 1770, when the French Parliament published it after its seizure from the Rector, who had been expelled by French authorities. The expression: "The ends justify the means," emanates from the Jesuit constitution which allows the members to lie, cheat, adulterate, murder in order to achieve their ends, as long as it is in the name of Jesus.[61]

78. It must be remembered that the Jesuits have had a long relationship with Canada[62] which is chronicled in case law[63] and most recently, the history of their involvement and assumed liability in the Indian Residential Schools Settlement Agreement.[64] The book, "The Secret History of the Jesuits"[65] by Edmond Paris chronicles their global misdeeds in formulating the First World War, the Spanish Flu, the Second World War, and now, as the Plaintiffs and Class Members evidence will show, a "pandemic."

79. The Order of the Garter[66] was founded in 1348 by King Edward III to establish a circle of elite nobility, to support the royal treasures and govern the people. Along with the Order,

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[60] https://www.jesuits.global/about-us/our-history/
[61] "The Constitutions of the Society of Jesus and Their Complementary Norms: A complete English Translation of the Official Latin Texts", Institute of Jesuit Sources, (Saint Louis, 1996).
[62] http://archivesjesuites.ca/en/the-collections-and-fonds-in-the-archive-of-the-jesuits-in-canada/
[63] *R. v. Bonhomme,* 1917 CarswellNat 22 (Exq. Ct.) at para 5; *Brown v. Cure & Marguilliers de l'Oeuvre*, 1874, CarswellQue 13 (P.C.) para 10; Brown v. Notre Dame de Montreal, 1874 CarswellQue 7 (P.C.).
[64]Indian Residential School Settlement Agreement, May 8, 2006.
[65] Secret History, Paris at *supra note* 4.
[66] Order of the Garter at *supra note* 6 and 7.

on August 6, 1348 King Edward III founded two new colleges, symbols of his devotion and generosity to the church. The official website explains

> These institutions, which were essentially communities of priests, were charged with celebrating divine service within the two political nerve centres of his realm.
>
> The first of these was the college of St. Stephen at Westminster Palace, the home of royal administration and justice. And the second was the College of St. George at Windsor Castle, the seat of his authority in England's greatest royal castle.

In choosing Saint George, it goes on to explain,

> St. George was not only an appropriate patron saint for the successful prosecution of his political ambitions in France but also for the values of knightly virtue that the king so admired. And it was in reaffirmation of Edward III's interest in these that he associated a group of knights with the college, the Order of the Garter. There were twenty-five Knights of the Garter with the king at their head, a number intended to mirror that of the Dean, canons and vicars of the college. Moreover, just as each canon of the college had a deputy, so each knight was to have his. A so-called Poor Knight who was intended to stand in as a deputy for daily religious observance.
>
> The two colleges founded by Edward III were amongst the most important and prestigious in medieval England but their subsequent histories have been very different……the Royal College of St. George at Windsor continues to serve as home for the sovereign's principal order of chivalry, the Order of the Garter.[67]

80. In 1911 there was a resurgence of the Order of the Garter and the Garter held its first service since the reign of George III after the investiture of the Prince of Wales (later Edward VIII).[68] In 1966 St. George's House is opened by Her Majesty Queen Elizabeth II for scholarly debate and exploration on the current global environments.[69]Most recently, the Royal Maundy Service returned to the Royal Chapel for the first time since 1959.[70] Today

[67] Official Website https://www.stgeorges-windsor.org/about-st-georges/history/
[68] https://www.stgeorges-windsor.org/about-st-georges/history/st-georges-timeline/
[69] https://www.stgeorges-windsor.org/about-st-georges/history/st-georges-timeline/
[70] https://www.stgeorges-windsor.org/about-st-georges/history/st-georges-timeline/

it is the most prestigious chivalric society in the world, the influence of which is unquestionable. In fact, by its own words,

> The Most Noble Order of the Garter is among the earliest of numerous orders of chivalry founded during the Middle Ages in the major courts of Europe. But it stands distinct from its peers on two counts.
>
> First, for the particular prestige that has always been attached to the order, and second for its survival to the present day. The establishment of the order was inextricably bound up with the interests and political circumstances of its founder, Edward III (1327-77).[71]

81. In explaining the significance of the symbol and motto, the official website explains,

> The use of what seems – to modern sensibilities – such a curious emblem has given rise to a popular legend about the foundation of the order. According to this, the Countess of Salisbury lost her garter during a court ball at Calais and Edward III retrieved it, rebuking those who had mocked her embarrassment with the words "Honi soit qui mal y pense" – shame on him who think evil of it – But this phrase, the motto of the order, actually refers to the king's claim to the French throne, a claim which the Knights of the Garter were created to help prosecute. As to the emblem of the Garter, it may perhaps less interestingly, derive from the straps used to fasten plates of armour.
>
> From the first the Order with its twenty-six so-called Companions was internationally constituted and this led to a distinction in its membership between Knights Subject, who were subjects of the English Crown, and Stranger Knights. Women were also associated with the Order in the Middle Ages and issued with its robes, although they were not counted as Companions. Such association ceased in the reign of Henry VII (1485-1509) but was revived in 1901, when King Edward VII appointed Queen Alexandra a Lady of the Order of the Garter. The first woman to be appointed a full Companion of the Order was Lavina, Duchess of Norfolk in 1990.
>
> Besides the twenty-six Companions various supernumerary appointments have been made to the Order since the reign of George III, all of them immediate members of the Royal family. Since 1813 all Stranger Knights have also been supernumerary appointments.[72]

[71] https://www.stgeorges-windsor.org/about-st-georges/history/the-order-of-the-garter/
[72] https://www.stgeorges-windsor.org/about-st-georges/history/the-order-of-the-garter/

82. This history is submitted by the Plaintiffs and Class Members in order to assist this Honourable Court in understanding the depth of this organization as it relates to the British Empire and the Commonwealth Nations across the globe. Currently, Queen Elizabeth II is the head of the Royal Order of the Garter and oversees the happenings of the College of Saint George as well as Saint George's House. The most recent appointment of Knights Companion was The Marquess of Salisbury, former Leader of the House of Lords in 2019 and the remaining current members are comprised of prominent businesspersons, bankers, military, and politicians.

83. The Order of the Garter's Saint George's House was established in 1966. The official website explains its inception and purpose as follows,

> St George's House, set in the historic grounds of Windsor Castle, was founded in 1966 by H.R.H. The Duke of Edinburgh and the then Dean of Windsor, Robin Woods. It is a place where people from right across society who are in a position to make a difference might gather together to grapple with issues pertinent to our contemporary world. The House thrives on debate, discussion and dialogue as a way of nurturing wisdom which can be put to use in the wider world.
>
> Those who come to the House work within sight of the Castle and, more closely, St George's Chapel where three times a day, every day, prayer is offered for the nation. That tradition of prayer, established in 1348 by King Edward III, has extended for more than six hundred years. It is precisely this tradition that gives the House its impetus and its wider theological context. The offering of prayer in the Chapel finds a practical expression in consultations, where the House offers space to work towards a better world for people of all creeds and none. Diversity in its many manifestations is something we strive at all times to acknowledge and accommodate.
>
> Our work embraces a number of strands: consultations on topics of national and international significance; our Society of Leadership Fellows, which offers comprehensive leadership training and development; clergy courses, which seek, both theologically and pragmatically, to refresh the practice and personal development of those in ministry; and hospitality for groups or organisations who, understanding the ethos and core objectives of the House, bring to us their own consultations. We also host a series of lectures. These include the St George's House Annual Lecture, the Elson Ethics

> Lecture, and the Finlay Theology Lecture. Taken together our annual programme is varied, rich, and intellectually challenging.
>
> In a world of twenty-four hour news and burgeoning social media where the headline and the soundbite dominate, opportunities to reflect deeply on difficult matters are fewer and further between. St George's House offers just such an opportunity. We ask our guests to argue cogently, to listen carefully, and to be open always to the possibility of changing one's mind. Time spent at the House should be enriching. We hope that people leaving the Castle grounds will do so intellectually refreshed, more deeply alert to the nuances of the topic to hand, and ready to put whatever wisdom they have acquired to full use in our society.

84. A cursory review of some of the titles and presenters of the House's Annual Review offers a flavour of the topics and influences the material is intended to have on the privileged and important audience. For instance consider the following,

> 2019 Professor Michael Ignatieff, "When the Times Are Out of Joint: The Consolations of History"
> 2018 Sir Christopher Meyer KCMG, "Britain and America: The Lessons of History"
> 2017 Baroness O'Neill of Bengarve CH CBE FBA, "Justice without Ethics: a Twentieth Century innovation?"
> …..
> 2005 Professor Timothy Garton Ash, "Europe – Freedom's Friend or Freedom's Foe?"
> 2004 Air Chief Marshal Sir Brian Burridge KCB CBE ADC RAF, "The Principles and Practice of Military Intervention in the Post-Modern World"
> 2003 Bridget M. Ogilvie, DBE, FRS, "Science and the Hope of Progress"
> 2002 F.W. De Klerk, "The Challenge of Diversity: Co-existing in a Globalized World"[73]

85. In light of the issues before the Court, the current global environment, and the facts as set out in the claim, the Plaintiffs and Class Members submit that the aforementioned evidence is relevant to the understanding of the complexity of the underlying relationships that are influencing the global arena on health and economics and Canada's place and role therein.

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[73] https://www.stgeorgeshouse.org/lectures/annual-lecture/previous-annual-lectures/

86. The relevancy of this evidence to Canada can be better understood by the use and role of the Usher of the Black Rod,[74] an official of the Parliament of Canada and the Secretary to the Queen in Canada. The Black Rod is carried by the Usher to open Parliament, and the inscription on the Black Rod is "*Honi soit qui mal y pense*,"[75] bearing witness to the control exerted by the Order of the Garter in Canada still to this day. Furthermore, this symbol and motto appears as the crest of all Federal, Provincial and Territorial courtrooms across Canada on the wall behind the judiciary. It is undeniable that the Order of the Garter holds a presence in the establishment of Canada both politically and legally.

87. Canada remains a colony to the British Empire, as evidenced, among other places, in two articles of the *British North America Act, 1867*:[76]

> *Section 9. "The Executive Government and Authority and over Canada is hereby declared to continue and be vested in the Queen."*
>
> And
>
> *Section 15: "The Command-in-Chief of the Land and Naval Militia, and of all Naval and Military Forces of and in Canada, is hereby declared to be continued and vested in the Queen."*

88. It is important to note that the Federal Government, or member(s) therein, appointed an active member of the military to head up the Covid-19 task force.[77] A plain-reading of s. 15 of the *BNA* Act above, would indicate that the Queen, and in turn the British Empire, is therefore the directing head of the Covid-19 task force and vaccination rollout.

89. The Federal Government, or member(s) therein, have issued Executive Orders (Orders-in-Council) for Covid-19 protocols based on guidance and recommendations of the World

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[74] https://sencanada.ca/en/sencaplus/how-why/usher-of-the-black-rod-is-parliaments-royal-attendant/
[75] https://blogs.bl.uk/digitisedmanuscripts/2020/04/st-george-and-the-garter.html.
[76] BNA, at *supra note* 5.
[77] Major General Dany Fortin, a former NATO commander in Iraq, will oversee the taskforce as per announcement November 27, 2020.

Health Organization and the United Nations. The following is a list of Orders-in-Council that are specifically at issue in the Plaintiffs and Class Members' claim. As the wrongdoings are ongoing, this list does not purport to be exhaustive;

a) PC Number 2020-0070, dated 2020-02-17 – invokes *Quarantine Act*
b) PC Number 2020-0157, dated 2020-03-18 – declaration pandemic
c) PC Number 2020-0175, dated 2020-03-24 – isolation facilities
d) PC Number 2020-0248, dated 2020-04-10 – fines for non-compliance
e) PC Number 2020-0260, dated 2020-04-14 – mandatory inquisition and masks
f) PC Number 2020-0279, dated 2020-04-28 – transfer, lease or loan public property
g) PC Number 2020-0305, dated 2020-05-10 – Canada Enterprise Emergency Funding Corporation
h) PC Number 2020-0411, dated 2020-05-30 – clinical trials

90. The Provincial Government of Ontario, or member(s) therein, declared a pandemic based on the guidance and recommendation of the World Health Organization on March 17, 2020.[78] This resulted in the drafting and implementation of various emergency statutes and regulations covering safety, lockdown protocol and means of enforcement. The Plaintiffs and Class Members submit that the following legislation and regulations pose the most significant infringement on fundamental rights and freedoms. As the wrongdoings are ongoing, this list does not purport to be exhaustive:

a) Reopening Ontario (A flexible Response to COVID-19) Act 2020
b) Coronavirus (COVID-19) Support and Protection Act, 2020

[78] COVID-19 declared emergency" means the emergency declared pursuant to Order in Council 518/2020 (Ontario Regulation 50/20) on March 17, 2020 pursuant to section 7.0.1 of the *Emergency Management and Civil Protection Act*.

c) Support Ontario's Recovery and Municipal Elections Act, 2020

91. The Plaintiffs and Class Members submit that a full picture cannot be appreciated without drawing the connection back to Rome and the special relationship that exists between it and the British Empire. As a British colony, Canada has certain obligations to the British Empire on the world stage as it relates to a global political agenda. In that regard, the relationship of Rome to the British Empire is a matter of consideration for this Honourable Court.

92. On May 24, 2015, the Pope delivered the encyclical letter entitled "Laudato Si."[79] On October 3rd, 2020 the Pope of Rome issued his encyclical letter entitled "Fratelli Tutti."[80] The first letter of 2015 dealt with humans and nature, and the second letter this October dealt with a new view of the world. At paragraph 100 of the October 3rd, 2020 letter, it states:

> *I am certainly not proposing an authoritarian and abstract universalism devised or planned by a small group and presented as an ideal for the sake of levelling, dominating and plundering.*"[81]

93. Despite saying the opposite, the Pope goes on to recommend that individual states give up their sovereignty and turn over governance to the United Nations so that we might have one world government in one world order under the leadership of the United Nations.

94. Calls for the surrender of personal rights and freedoms and national sovereignty to universal Papal authority, is an enduring agenda in Vatican politics. The common people are to be submitted to this goal without consultation or representation. This is also

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[79] The Holy Father Francis. Encyclical Letter *Laudato Si* (2015): http://www.vatican.va/content/francesco/en/encyclicals/documents/papa-francesco_20150524_enciclica-laudato-si.html

[80] The Holy Father Francis. Encyclical Letter *Fratelli Tutti.*, (October 3, 2020) at *supra note* 1.

[81] The Holy Father Francis. Encyclical Letter *Laudato Si* (2015) at *supra note* 34.

represented in the fact, that 'Fratelli Tutti' (2020), is only the most recent declaratory expression of the Papal State's perpetual refusal to accept universal rights and freedoms as vested in each individual naturally, requiring no papal approval of their existence. On, 24 August 1215, Pope Innocent III (1161–1216) issued a papal bull annulling the Magna Carta. As overlord of the kingdom, and protector of a king who had taken a crusader's vow, Innocent III declared the royal acknowledgment of rights and freedoms in the Magna Carta null and void of validity, and despised it as "illegal, unjust, harmful to royal rights and shameful to the English people". The Pope's declaration remained of no consequences but rather, what he despised was confirmed in the Magna Carta of 1297 and formally enshrined in the Bill of Rights in 1689.[82] The Papal encyclica and establishment of Councils are the continued efforts to force nations to relinquish sovereignty and democratically guaranteed rights and freedoms while subtly attacking our Constitutional orders.

95. The 'Council for Inclusive Capitalism with the Vatican' was established on December 8, 2020 in an historic new partnership between some of the world's largest investment and business leaders and the Vatican. The vision of the Council for Inclusive Capitalism is fundamentally about creating long-term value for all stakeholders – businesses, investors, employees, customers, governments, communities, and the planet. This includes further enhancement of environmental, social, and governance measures in their operations in order to help achieve the United Nations Sustainable Development Goals.[83] Interestingly,

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[82] British Library Collection, Bulla Innocentii Papae III. pro rege Johanne, contra barones. (In membr.) 1216. 151, created 24 August 12 15, at Agagni, Italy, Cotton Manuscript, bound with Cotton MS Cleopatra E I Collection, ff. 155–156.

[83] Official Website: https://www.inclusivecapitalism.com/guiding-principles/

these are the same United Nations Sustainable Development Goals espoused by Prime Minister Trudeau as preparing us for the Great Reset.

96. The Council for Inclusive Capitalism's founding and managing partner is Lady Lynn Forrester de Rothschild, who incidentally is the wife of Sir Evelyn de Rothschild who is the personal financial advisor to Her Majesty Queen Elizabeth II. In advising the Pope she is aided by a group called the Guardians; Rajiv Shah, CEO Rockefeller Foundation, Darren Walker, CEO FordFoundation, Head of Dupont, Merck, Johnson & Johnson, CEOs of all major credit cards, Mark Carney, United Nations Special Advisor for Climate Action and Finance, together with the CEO of the Bank of America.[84] All advising to help achieve the United Nations Sustainable Development Goals.

COVID-19 Factual Overview

97. On March 12, 2020 the World Health Organization declared Covid-19 a global pandemic.[85]

98. The Director-General of the World Health Organization is Dr. Tedros Adhanom Ghebreyesus.[86] Dr. Tedros Adhanom Ghebreyesus was appointed as Director-General of the World Health Organization in 2017. The Plaintiffs' will put forward Expert Evidence on the full record indicating that the current Director-General is accused of aiding genocide in Ethiopia between 2013 and 2015 and reports have been made that criminal charges have been laid.[87] In the prosecution that is before the International Criminal Court, Dr. Tedros Adhanom Ghebreyesus is indicted as being one of three officials who were in charge of

[84] Official Website: https://www.inclusivecapitalism.com/our-guardians/
[85] Official Website: https://www.euro.who.int/en/health-topics/health-emergencies/coronavirus-covid-19/news/news/2020/3/who-announces-covid-19-outbreak-a-pandemic
[86] Official Website: https://www.who.int/director-general
[87] Mail Online, Rachel Bunyan, December 14, 2020

the security services over that period, in which the “killing” and “torturing” of Ethiopians took place.

99. In 2000 Bill Gates steps down as Microsoft CEO and creates the 'Gates Foundation" and (along with other partners) launches the 'Global Alliance for Vaccines and Immunization (GAVI;).[88] The Gates Foundation has given GAVl approximately $4.1 Billion. Gates has further lobbied other organizations, such as the World Economic Forum ("WEF") and governments to donate to GAVI including Canada and its current Prime Minister, Justin Trudeau, who has donated over $1 Billion in Canadian taxpayers dollars to the partnership scheme of GAVI and the World Health Organization, upon continued lobbying by Gates.

100. On March 17, 2020- Prime Minister Trudeau asks for lockdown measures, under the Federal *Quarantine Act*, banning travel. The same date Premier Doug Ford declares an Emergency in Ontario, under the Provincial legislation.

101. On March 19, 2020 - The status of COVID-19 in the United Kingdom is downgraded. COVID-19 is no longer considered a high consequence infectious disease (HCID).[89] The Advisory Committee on Dangerous Pathogens (ACDP) in the UK is also of the opinion that COVID-19 should no longer be classified as an HCID (High Consequence Infectious Disease).[90]

102. On March 24th, 2020 -Global medical experts declared that efforts to contain the virus through self-isolation measures would negatively impact population immunity, maintain a high proportion of susceptible individuals in the population, prolong the outbreak putting

[88] WHO history, at *supra note* 14.
[89] https://www.gov.uk/topic/health-protection/infectious-diseases
[90] https://preforthat.com/uk-officals-covid-19-no-longer-high-consequence-infectious-disease/

more lives at risk, damage to our economy and the mental stability and health of the more vulnerable.[91]

103. On March 24,2020 -Bill Gates announces funding for a company that will blanket Earth with $1 billion in video surveillance satellites.

104. On March 26th, 2020, Microsoft announces it is acquiring' Affirmed Networks" focused on 5-G and "edge" computing".

105. March 31, 2020, Dr. Theresa Tam states that, "it is not clear that masks actually help prevent infections and may increase the risk for those wearing them."

106. On April 21, 2020 - Bill Gates states that a coronavirus vaccine "is the only thing that will allow us to return to normal."

107. On April 6, 2020 – German epidemiologist, Knut Wittkowsky releases a statement warning that artificially suppressing the virus among low-risk people like school children may increase the number of new infections" as it keeps the virus circulating much longer than it normally would.[92]

108. On April 15, 2020 - Bill Gates pledges another $150 million to coronavirus vaccine development and other measures. He states, "There are seven billion people on the planet. We are going to need to vaccinate nearly everyone."

109. On April 18, 2020, US News reports corona virus tests are ineffective due to lab contamination at the EDC and the CDC's violation of its manufacturing standards.

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[91] https://www.europeanloaded.com/twenty-two-experts-questioning-the-coronavirus-panic-videos-scientific-common-sense/

[92] Stand Up for Your Rights, says Bio-Statiscian Knut M. Wittkowski, American Institute for Economic Research. April 6, 2020. https://www.aier.org/article/stand-up-for-your-rights-says-professor-knut-wittkowsky/

110. On April 24, 2020 - The Ontario government took the "extraordinary step" to release a database to police with a list of everyone who has tested positive for COVID-19 in the province.[93]

111. On April 30, 2020 – Bill Gates writes that "the world will be able to go back to the way things were ... when almost every person on the planet has been vaccinated against coronavirus." Gates also states that "Governments will need to expedite their usual drug approval processes in order to deliver the vaccine to over 7 billion people quickly."

112. On May 14, 2020, Microsoft announces that it is acquiring UK-based 'Metaswitch Networks", to expand its Azure 5-G strategy.

113. On May 19, 2020 - Health Canada approves human trials of a SARS-Co V-2 (COVID-19) vaccine without clear evidence that prior animal testing to identify the potential risk of pathogenic priming (immune enhancement) has been conducted.

114. By May 2020 - Over six million Canadians have applied for unemployment benefits and 7.8 million Canadians required emergency income support from the Federal government, because of economic shut-downs and closures dictated by Covid-measures.

115. By May, 2020 - Estimates of the Federal deficit resulting from their response to SARS-CoV-2 (COVID-19) ranges up to $400 billion. (This exceeds the Canada's national budget for a year).

116. On May 20, 2020 - Dr. Teresa Tam, Canada's Chief Medical Officer, publicly advised the use of non-medical masks for the general public to provide an "added layer of protection" that could help prevent asymptomatic or pre-symptomatic Covid-19 patients from unknowingly infecting others. Dr, Tam's advice is not supported by scientific evidence.

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[93] https://toronto.ctvnews.ca/ontario-takes-extraordinary-step-to-give-police-list-of-all-covid-19-patients-1.4910950

117. On May 22, 2020 – Prime Minister Justin Trudeau told reporters that “contact tracing" needs to be ramped up across the county. Trudeau stated that he “strongly recommends" provinces use cell phone apps when they become available, and that this use would likely be mandated.

118. On or about May 25, 2020, the Federal government announced potential Criminal Code provisions, making it a criminal offence to publish "misinformation" about the COVID-19. "Misinformation" quickly evolves to mean as any opinion or statement, even from recognized experts, which contradicts or criticizes measures taken and/or mandated by the WHO, to be implemented globally by national and regional governments.

119. As of June 9, 2020, neither Prime Minister Trudeau, nor Premier Ford are willing and in fact refusing to disclose what medical advice, and from whom, they are acting.

120. On June 23, 2020, the Justice Centre for Constitutional Freedoms calls for, in a 69-page report, an end to the lock-down measures based on an analysis of the lack of medical and scientific evidence for their imposition and the infliction of unwarranted and severe Charter violations.

121. On June 18, 2020, Premier Doug Ford announced an upcoming up-step and acceleration of the implementation of “contract tracing" surveillance through cellphones.

122. On July 24, 2020, the Ontario government revoked the Declaration of Emergency ordered under the *Emergency Management and Civil Protection Act*, R.S.O. 1990, c. E.9 and brought into effect the *Reopening Ontario (A Flexible Response to COVID-19) Act*, 2020, S.O. 2020, c. 17.

123. On November 27, 2020 the Federal Government, or member(s) therein, appointed an active member of the military to head up the Covid-19 task force for the rollout of the vaccines.[94]

WRONGDOINGS AND CONSTITUTIONAL CHALLENGES

124. The Plaintiffs and Class Members submit that the Defendants share responsibility and liability as it relates to the wrongdoings perpetrated against them in relation to the Covid-19 response effort advanced by the Federal, Provincial and Municipal Governments, or member(s) therein, that is currently underway in Canada. The Plaintiffs and Class Members submit that this effort has been orchestrated by the World Health Organization and its affiliates, resulting in guidelines and recommendations being adopted into Canadian Orders-In-Council without lawful authority and due process.

125. The Plaintiffs and Class Members submit that the Defendants are vicariously liable for the following wrongdoings;

a) Unequivocally adopting international guidelines and recommendations put forward by the World Health Organization through Orders-In-Council without lawful authority and due process; and

b) Implementing international guidelines and recommendations through legislation which suspend and infringe the Plaintiffs and Class Members fundamental rights and freedoms as set out in the *Canadian Charter of Rights and Freedoms*; and

c) Knowingly and willfully advancing, promoting, adopting and manufacturing Covid-19 protocols, task force response and medical protocols which violate terms and provisions of the *Crimes Against Humanity and War Crimes Act*, (S.C. 2000,

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[94] Major General Dany Fortin, a former NATO commander in Iraq, will oversee the taskforce as per announcement November 27, 2020.

c. 24) under the rubric of a state of emergency that is both unconstitutional and unlawful.

A. *Unequivocally adopting international guidelines and recommendations put forward by the World Health Organization through Orders-In-Council without lawful authority and due process*

126. This wrongdoing is specifically addressed above in motion for interim declaratory relief. The Plaintiffs and Class Members submit that the Federal, Provincial and Municipal Governments, or member(s) therein, have suspended fundamental rights and freedoms that are the foundation of the democratic system of Canada, by the adoption and imposition of international standards set out by the World Health Organization and the United Nations without legal authority and due process. The Plaintiffs and Class Members submit that this is fundamentally flawed.

127. The Plaintiffs and Class Members rely on the English common law as prohibiting unilateral adoption of international treaties, covenants, guidelines and recommendations, without due process. In this instance, the Plaintiffs and Class Members submit that due process requires that these international recommendations and instruments first be indoctrinated into legislation before a full assembly of Parliament, in order to have legal authority to suspend, vary or deny the constitutional rights and freedoms of the Canadian public.[95]

128. Furthermore, the Plaintiffs and Class Members submit that this Honourable Court is bound by the recent decision of the Supreme Court of Canada in *Nevsun Resources Ltd. v. Araya*.[96] The Plaintiffs and Class Members ask that this Honourable Court contemplate the first few paragraphs of Majority's decision,

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[95] *Nevsun, Hape* and *Baker*, at *supra note* 28.
[96] *Nevsun,* at *supra note* 28.

> This appeal involves the application of modern international human rights law, the phoenix that rose from the ashes of World War II and declared global war on human rights abuses. Its mandate was to prevent breaches of internationally accepted norms. Those norms were not meant to be theoretical aspirations or legal luxuries, but moral imperatives and legal necessities. **Conduct that undermined the norms was to be identified and addressed**
>
> The process of identifying and responsively addressing breaches of international human rights law involves a variety of actors. Among them are courts, which can be asked to determine and develop the law's scope in a particular case. This is one of those cases.[97]

129. The Plaintiffs and Class Members submit that the unilateral adoption by the Federal, Provincial and Municipal Governments, or member(s) therein, of international guidelines and recommendations espoused by the World Health Organization, that cause the suspension of fundamental rights and freedoms protected by the *Charter of Rights and Freedoms* and customary international law, unlawfully and without due process, is exactly the "conduct that undermines the norms" that the Supreme Court of Canada was stating needed identification and addressing. And it is this exact conduct that the Plaintiffs and Class Members have asked that this Honourable Court identify and address on an interim declaratory basis.

B. *Implementing international guidelines and recommendations through legislation which suspend and infringe the Plaintiffs' fundamental rights and freedoms as set out in the Canadian Charter of Rights and Freedoms*

130. The Plaintiffs and Class Members submit that as a result of the Federal, Provincial and Municipal Governments, or member(s) therein, unilaterally adopting the recommendation to declare a pandemic as the basis in which to invoke or legislate emergency protocols

[97] *Ibid* at para 1 & 2.

advocated by the World Health Organization and its affiliates, caused the pith and substance of that legislation to be in its force and effect, outside its constitutional authority. Without due process in the adoption of international standards and guidelines, there can be no legal authority to legislate or take action, in that regard. Furthermore, in light of the national health and safety concerns, the question of the division of powers is raised and requires consideration.

131. If this Honourable Court finds that the Federal Government had the lawful authority to unilaterally adopt the recommendations of the World Health Organization to declare a pandemic without due process, it is respectfully submitted that any subsequent legislation or regulations that came from that recommendation, by either the Federal or Ontario Governments, or member(s) therein, is required to undergo *Charter* scrutiny to ensure that the Plaintiffs and Class Members' rights and freedoms remain protected by the *Canadian Charter of Rights and Freedoms.*

132. The Plaintiffs submit that the following is a partial list of legislation and regulations that are relevant to an understanding of the suspension and infringement of the Plaintiffs and Class Members fundamental *Charter* rights and freedoms;

a) *Emergencies Act*, R.S.C. 1985, c. 22 (4th Supp.)

> Preamble states:
>
> AND WHEREAS the fulfilment of those obligations in Canada may be seriously threatened by a national emergency and, in order to ensure safety and security during such an emergency, the Governor in Council should be authorized, ***subject to the supervision of Parliament***, to take special temporary measures that may not be appropriate in normal times;
>
> AND WHEREAS the Governor in Council, in taking such special temporary measures, would be ***subject to the Canadian Charter of Rights and Freedoms and the Canadian Bill of Rights and must have regard to the International Covenant on Civil and Political Rights, particularly with***

respect to those fundamental rights that are not to be limited or abridged even in a national emergency

b) *Emergencies Management Act,* S.C. 2007, c. 15

c) *Quarantine Act*, S.C. 2005, c. 20

Section 5(1) states: The Minister may designate qualified persons, or classes of qualified persons, as analysts, screening officers or environmental health officers

d) *Emergency Management and Civil Protection Act,* R.S.O. 1990, c. E.9.

Section 7.0.1(1) states
Subject to Subsection (3), the Lieutenant Governor in Council or the Premier, if in the Premier's opinion the urgency of the situation requires that an order be made immediately, may by order declare that an emergency exists throughout Ontario or in any part of Ontario

Section 7.0.1(3) states
An order declaring that an emergency exists throughout Ontario or any part of it may be made under this section ***if, in the opinion of*** the Lieutenant Governor in Council or the Premier, as the case may be, the following criteria are satisfied:

1. There is an emergency that requires immediate action to prevent, reduce or mitigate ***a danger of major proportions that could result in serious harm*** to persons or substantial damage to property.

Section 7.0.2 (1) states:
The purpose of making orders under this section is to promote the public good by protecting the health, safety and welfare of the people of Ontario in times of declared emergencies in a manner that is subject to the *Canadian Charter of Rights and Freedoms*

e) *Reopening Ontario (A Flexible Response to COVID-19)* Act, 2020, S.O.2020, c. 17

Section 2(1) states
The orders made under section 7.0.2 or 7.1 of the *Emergency Management and Civil Protection Act* that have not been revoked as of the day this subsection comes into force are continued as valid and effective orders under this Act and cease to be orders under the *Emergency Management and Civil Protection Act*

Section 4(1) The Lieutenant Governor in Council may, by order

> a) subject to subsections (2) and (5), amend a continued section 7.0.2 order in a way that would have been authorized under section 7.0.2 of the *Emergency Management and Civil Protection Act* ***if the COVID-19 declared emergency were still in effect*** and references in that section to the emergency were references to the COVID-19 pandemic and its effects
>
> Section 17 states
> Unless it has been terminated before this section comes into force, the COVID-19 declared emergency is terminated and Ontario Regulation 50/20 (Declaration of Emergency) is revoked

133. The Plaintiffs and Class Members submit that the sum effect of the orders contained in the Regulations are:

a) Ordering the shut-down of all business, except for 'essential" businesses which were tied to food, medicine, doctors and hospitals;

b) A 'social distancing" of two (2) meters;

c) No 'public gathering" of more than five (5) persons who are un-related, with 'social distancing" of two (2) meters, which was later increased to ten (10) persons;

d) Restaurant and bar shut-downs, except for take-out service;

e) The physical closure of all public and private schools, daycares, and universities;

f) The mandatory use of face-masks, mandated by the Ministry of Health, to all the Medical Regulatory Medical Services Colleges, to direct all their licensed members to impose mandatory masking of all patients, employees, and members, in their place of work;

g) The shut-down of all park amenities including all play-grounds and facilities for children;

h) The elimination of one-on-one, and all other programs for special-needs children, and those suffering from neurological and physical disabilities;

i) Banning all public gatherings over five (5) -persons, notwithstanding a social distancing of two (2) meters, including the banning of religious services, including a restriction on marriages, funerals, and other religious actions and ritual and rites.

j) The provision for offences, laying of charges, and imposition of heavy fines for breach of the orders, with an impossibility to challenge those fines as the Provincial Offences Court was (and could again) be physically closed and the *Provincial Offences Act* tickets make it clear that the charge and line cannot be 'mailed in" but that the person must attend, physically, at the Provincial Offences Court to file a defence of the charges, only to find a closed Courthouse.

134. The Plaintiffs and Class Members submit that the following rights and freedoms have been either suspended or infringed by the legislative acts of the Federal and Ontario Governments, or member(s) therein. As the wrongdoings are ongoing in this regard, this list does not purport to be exhaustive.

> Section 2 protects our fundamental rights to:
> a) Freedom of Conscience and Religion;
> b) Freedom of Thought, beliefs and opinion and expression including freedom of the press and other media of communication;
> c) Freedom of peaceful assembly; and
> d) Freedom of association

135. The Plaintiffs and Class Members submit that their Section 2(a),(c) and (d) fundamental rights were *prima facie* suspended and infringed by the implementation of the Ontario Government's *Reopening Ontario (A Flexible Response to COVID-19) Act*,[98] and the subsequent Regulations, which set out the protocol and enforcement of the restriction of

[98] 2020, S.O. 2020, c. 17.

movement and gathering of the Plaintiffs and Class Members on the modified basis of "the Covid-19 pandemic and its effects" without lawful authority and due process.[99]

136. The Plaintiffs and Class Members also submit that their Section 2(b) rights have been infringed by the Federal, Provincial and Municipal Governments, or member(s) therein, using the broadcasting system for the advancement of a propaganda campaign disseminating one-sided information directed at promoting the international guidelines and recommendations of the World Health Organization and its affiliates, contrary to the principles set out in s. 2(b) of the *Charter*, the infringement of which requires further consideration and oversight.

> Section 6(1). Every citizen of Canada has the right to enter, remain in and leave Canada

137. The Plaintiffs and Class Members submit that their Section 6(1) right to enter, remain and leave Canada was *prima facie* suspended and infringed with the invocation of the *Emergency Act*[100] and the *Quarantine Act*[101] by the Federal Government, or member(s) therein, on the basis of the declaration of a pandemic without lawful authority and due process which cannot be justified pursuant to s. 1.

> Section 7 Everyone has the right to life, liberty and the security of the person and the right not to be deprived thereof except in accordance with the principles of fundamental justice

138. The Plaintiffs and Class Members submit that their Section 7 right to life, liberty and the security of the person was suspended and infringed with the invocation of the aforementioned legislation, both Federal and Provincial, based on the unilateral adoption

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[99] S. 7(3) Reopening Ontario
[100] R.S.C. 1985, c. 22 (4th Supp.)
[101] S.C. 2005, c. 20

of the recommendation to declare a pandemic by the World Health Organization. Since that time, the Plaintiffs' and Class Members' rights remain suspended and infringed despite the state of emergency being revoked, which cannot be justified pursuant to s. 1.

> Section 8 Everyone has the right to be secure against unreasonable search or seizure

139. Pursuant to the Ontario Government's legislation *Reopening Ontario (A Flexible Response to COVID-19) Act*,[102] and the subsequent Regulations, the Plaintiffs and Class Members' health records are tracked and disclosed to third parties[103] without due process or informed consent rendering this act unlawful and unjustified under s. 1, particularly in light of the revocation of the declaration of emergency.

> Section 12. Everyone has the right not to be subjected to any cruel and unusual treatment or punishment

140. The Plaintiffs and Class Members submit that any summary enforcement provisions, or otherwise, that were implemented, upheld and continue to be applied under the aforementioned legislation and regulations suspends and infringes the Plaintiffs and Class Members' s. 12 rights and cannot be justified under s. 1 in light of the lack of authority and due process.

> Section 25. The guarantee in their charter of certain rights and freedoms shall not be construed so as to abrogate or derogate from any Aboriginal, treaty or other rights of freedoms that pertain to the Aboriginal peoples of Canada

141. The Plaintiffs and Class Members submit that the relationship of the Indigenous Peoples to Canada requires review and consideration in this instance as it relates to the Covid-19 emergency response. Evidence is arising suggesting that the *sui generis* relationship of

[102] 2020, S.O. 2020, c. 17.
[103] S. 4(5)

Indigenous Peoples to the Crown is giving them priority in the vaccine rollout which could have disastrous effects on the mind, body and health of an entire group of people. All of which is being undertaken without legal authority or due process and cannot be justified under s. 1.

> Section 26. The guarantee in their charter of certain rights and freedoms shall not be construed as denying the existence of any other rights or freedoms that exist in Canada

142. The Plaintiffs and Class Members submit that this section recognizes the underlying principles of natural justice that support and protect our individual rights and freedoms which are encapsulated in the English common law, the Magna Carta of 1297, the Bill of Rights, 1689 and the customary international law that flows beneath the fundamental tenents of the Canadian democratic system. By the Federal and Provincial Governments, or member(s) therein, unilaterally adopting the recommendations and guidelines of the World Health Organization, without authority and due process, the rights and freedoms underlying the very fabric of the Canadian democratic system have been unjustifiably suspended and infringed.

143. The Plaintiffs and Class Members submit that subsequent to the unlawful declaration of a pandemic by the Federal and Provincial Governments, or member(s) therein, legislation and regulations were invoked that suspended and infringed the rights and freedoms of the Plaintiffs without justification or due process. The Plaintiffs and Class Members request that this Honourable Court undertake an inquiry into the constitutionality of the legislated Covid-19 protocols and emergency response.

C. *Knowingly and willfully advancing, promoting, adopting and manufacturing Covid-19 protocols, task force response and medical protocols which violate terms and provisions of the*

Crimes Against Humanity and War Crimes Act, (S.C. 2000, c. 24) under the rubric of a state of emergency that is both unconstitutional and unlawful

144. The Plaintiffs and Class Members submit that as the Covid-19 response has evolved into a vaccine rollout, any actions taken by the Governments, or member(s) therein, relating to the mind, body and health of the Plaintiffs and Class Members, or the Canadian public in general, shall invoke the provisions of the *Crimes Against Humanity and War Crimes Act*, in light of the inherent risks involved with a mass inoculation of a populous without due process of either the governing body or the scientific community.

145. Pursuant to Section 4(3) of the *Crimes Against Humanity and War Crimes Act*, the definition of crime against humanity includes,

> murder, extermination, enslavement, deportation, imprisonment, torture, sexual violence, persecution ***or any other inhumane act or omission*** that is committed against any civilian population or any identifiable group and that, at the time and in the place of its commission, constitutes a crime against humanity according to customary international law or conventional international law or by virtue of its being criminal according to the general principles of law recognized by the community of nations, whether or not it constitutes a contravention of the law in force at the time and in the place of its commission.

146. In this regard, the Plaintiffs and Class Members submit that the promotion and advancement of the vaccine rollout without due process is an inhumane act or omission by the Government that falls within the definition of a crime against humanity. Legislators do not have the specialized knowledge required to conduct the necessary risk-benefit analysis of the individual. All vaccines carry risks. Compulsory vaccination constitutes a gross violation of the right to informed consent.

147. The *Declaration of Helsinki* states that every research project,

> […] must be preceded by careful assessment of predictable risks and burdens... in comparison with foreseeable benefits" (article 18). It adds that

> the research should be stopped when the risks outweigh the potential benefits (article 20). Researchers must ensure equilibrium between the potential risks and benefits of the research and that the risks have been minimized (guideline 8)."[104]

148. Furthermore, the *Declaration of Helsinki* and the Council for International Organizations of Medical Sciences (CIOMS) requires that:

> […] vulnerable people should not be included in research unless the research is indispensable to the improvement of their health and it cannot be done with people who are not capable of providing consent[105]

In this instance, the mass vaccination planned not only lacks informed consent, it is also specifically directed at the vulnerable, children and Indigenous Peoples first.

149. The Plaintiffs and Class Members submit that according to the U.S. American Pfizer and BioNTech trials, the risk of infection is lowered by 0.39%.[106] In addition, the ineffective PCR-test cannot establish that people did not pass asymptomatically through an infection with SARS-CoV-2 already. The Plaintiffs and Class Members intend to present a thorough record of expert scientific evidence where it will be shown that the use of the Polymerase Chain Reaction test in order to track infection is highly questionable within the scientific community.

150. Furthermore, there will be credible scientific evidence put forward by the Plaintiffs and Class Members of the inherent risks associated with the mRNA vaccination program, the speed with which it was put to auction, and long-term effects of the associated risks. The Covid vaccines are mRNA vaccines. mRNA has never been used as a vaccine. No mRNA sequence has ever been licensed for human use before. In essence, we have absolutely no

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[104] Council for International Organizations of Medical Sciences (CIOMS) and the World Health Organization. International ethical guidelines for biomedical research involving human subjects. Geneva: CIOMS; 2002. Julie Samuël,Gene Therapy, section VI in book

[105] *Ibid.*

[106] https://www.clinicaltrials.gov/BioNTech-Pfizer.

idea what to expect from this material that is being sold to the public as "vaccine". The duty that the manufacturers owe to the regulatory bodies and the public that the vaccines will be safe and effective is simply lacking.

151. The Plaintiffs and Class Members submit that it is important to understand that traditional vaccines simply introduce pieces of a virus to stimulate an immune reaction. The new mRNA vaccine is completely different. It actually injects (transfects) molecules of synthetic genetic material from non-human sources into our cells. Once in the cells, the genetic material interacts with our transfer RNA (tRNA) to make a foreign protein that supposedly teaches the body to destroy the virus being coded for. Most recently, studies by Zhang L et al., published on 13 December 2020, have provided evidence that the SARS-CoV-2 genome transcended into the human body had been triggered a human body response of integrating the SARS-CoV-2 genome into the human DNA sequences. But not only that, further observations have shown that these new SARS-CoV-2 genome/human DNA complexes will facilitate the reproduction of chimere mRNA by copying from the unnatural integrated SARS-CoV-2 genome/DNA construct. Studies as early as 2003, have shown that this will likely be facilitated in testicles ad ovaries among other organs. Therefore, clear evidence for the manipulation and mutation of the human genome could already be established.[107]

152. The Plaintiffs and Class Members submit that forcing people to accept a transvection with mRNA material that will change their genome is ultimately, constituting a government imposed eugenic program. The mRNA molecule is vulnerable to destruction. So, in order to protect the fragile mRNA strands while they are being inserted into our DNA they are

[107] Zhang L, *et al*, 2020bioRxiv; https://doi.org/10.1101/2020.12.12.422516.

coated with PEGylated lipid nanoparticles. This coating hides the mRNA from our immune system which ordinarily would kill any foreign material injected into the body. PEGylated lipid nanoparticles have been shown to trigger their own immune reactions, and to cause damage to the liver.[108]

153. Furthermore, since viruses mutate frequently, the chance of any vaccine working for more than a year is unlikely. That is why the flu vaccine changes every year. As of 13 December 2020, the GISAID (Global Initiative for Sharing Influenza Virus Data)[109] has already registered 3,422 variations of the SARS-CoV-2. We are now into the 11th month of the SARS-CoV-2 virus epidemic. Implying to the Canadian public that the vaccine developed without using isolated and cultured virus material will protect them from the current virus and its new strands is simply fraudulent. In addition, absolutely no long term safety studies will have been done to ensure that any of these vaccines won't cause the cancer, seizures, heart disease, allergies, and autoimmune diseases seen with other vaccines.

154. The Plaintiffs and Class Members submit that the aforementioned scientific analysis is necessary and has yet to be given meaningful discussion despite the momentum to rollout untested inoculations.

155. The Plaintiffs and Class Members submit that although there are a number of serious legal issues surrounding the urgency of the vaccine rollout, the biggest concern for the general public is the corresponding lack of meaningful and informed consent. It is trite to suggest that people require fully informed consent when it comes to undertaking an experimental inoculation program. Accordingly, the principle of informed consent, as established first during the Doctors' Trial at Nuremberg, includes the fundamental right and freedom of

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[108] *Ibid*.
[109] https://www.gisaid.org/.

declaring informed dissent to a medical procedure or such treatments affecting the health or bodily integrity of the patient. The Plaintiffs and Class Members submit that informed consent is one of those fundamental rights and freedoms that underscore the democratic colonial system on which Canada is built.

156. Evidence will be put before this Honorable Court bringing into direct question ethical concerns that remain outstanding in terms of the key players in the World Health Organization, such as its' Director, Tedros Adhanom Ghebreyesus who was accused before the International Criminal Court, of being one of three officials who were in charge of the security services between 2013 and 2015, wherein the "killing" and "torturing" of Ethiopians took place. Tedros was appointed as Director of the World Health Organization in 2017. The World Health Organization and UNICEF are implicated in the fraudulent mass sterilization that occurred after the 2014 tetanus vaccination campaign was undertaken in Kenya.[110]

157. To build the confidence of a public to such a degree that the "believe in science" stamp suffices to relinquish a duty to disclose and undertake proper standards and testing in which to develop and distribute a vaccination, seems contrary the fundamental rights that permeate the English common law and customary international law.

158. The Plaintiffs and Class Members submit that any inquiry into the principles of fundamental rights and freedoms is informed, not only by Canadian experience and jurisprudence, but also by international law, including the principle of "*jus cogens*."[111] With customary international law, there is a subset of norms known as *jus cogens*, or peremptory norms, which have been accepted and recognized by the international

[110] Official Website: https://www.afro.who.int/news/statement-who-and-unicef-tetanus-vaccine-kenya
[111] *Nevsun,* at *supra note* 28 paras 81-83.

community of States as a whole from which no derogation is permitted and which can be modified only by a subsequent norm of general international law having the same character. Peremptory norms have also been accepted as fundamental to the international legal order.[112] This takes into account Canada's international obligations to protect and uphold fundamental rights and freedoms that have been enshrined in various sources of international human rights law – declarations, covenants, conventions, judicial and quasi-judicial decisions of international tribunals and customary norms. The Plaintiffs and Class Members state that crimes against humanity and genocide have been accepted as peremptory norms within the international legal community.[113]

159. The Plaintiffs and Class Members submit that this Honourable Court has a duty to intervene when a crime against humanity or genocide has occurred or is about to occur. It is asked by the Plaintiffs and Class Members that the seriousness of the scientific concerns available to this Court be given equal footing sufficient enough to undertake meaningful discussion on the dangers and risks associated with modern mass inoculation campaigns; to which there are a number of examples and the World Health Organization facilitates them all.[114]

160. Furthermore, pursuant to Section 5(2) of the *Crimes Against Humanity and War Crimes Act*, a 'superior' commits an indictable offence if,

> (a) the superior
>
> > (i) fails to exercise control properly over a person under their effective authority and control, and as a result the person commits an offence under section 4, or

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[112] *Ibid* at para 84.

[113] Nuremberg Military Trials (IMT Subsequent Trials aka NMTs) Eugenics, genocidal policies, "Doctors' Trial", Convention on Genocide – United Nations, U.N. Declaration on the Rights of Indigenous Peoples, Crimes Against Humanity and War Crimes Act, Criminal Code of Canada – genocide is defined.

[114] https://www.justice.gov/opa/pr/justice-department-announces-largest-health-care-fraud-settlement-its-history Mass inoculation for tetanus by the WHO raised alarm bells when it was discovered it was laced with a sterility drug.

(ii) fails, after the coming into force of this section, to exercise control properly over a person under their effective authority and control, and as a result the person commits an offence under section 6;

(b) the superior knows that the person is about to commit or is committing such an offence, or consciously disregards information that clearly indicates that such an offence is about to be committed or is being committed by the person;

(c) the offence relates to activities for which the superior has effective authority and control; and

(d) the superior subsequently

(i) fails to take, as soon as practicable, all necessary and reasonable measures within their power to prevent or repress the commission of the offence, or the further commission of offences under section 4 or 6, or

(ii) fails to take, as soon as practicable, all necessary and reasonable measures within their power to submit the matter to the competent authorities for investigation and prosecution.

superior means a person in authority, other than a military commander

161. The Plaintiffs and Class Members submit that if the Federal, Provincial or Municipal Governments, are immune from prosecution in any capacity, individual member(s) of the Government can be held responsible and liable within their roles as 'superiors' for the harms associated with the Covid-19 emergency response and vaccine rollout. Such persons within Canada would include, but are not limited to,

i. Justin Trudeau
ii. Dr. Theresa Tam
iii. Doug Ford
iv. Christine Elliott

162. The Plaintiffs and Class Members submit that the Government, or member(s) therein, are liable for knowingly and willfully advancing, promoting, adopting and manufacturing Covid-19 protocols, task force response plans and medical protocols which violate terms and provisions of the *Crimes Against Humanity and War Crimes Act*, (S.C. 2000, c. 24) under the rubric of a state of emergency that is both unconstitutional and unlawful. As the Governments, or member(s) therein, continue to undertake the mass vaccination rollout on

an urgent basis, the actions and consequences bare redress. As casualties and harms begin to accumulate the question of wilful blindness comes further into the light lending a stronger duty to this Honourable Court to intervene.

163. The Plaintiffs and Class Members state that since March 3, 2020, the conditions imposed on the Canadian public since the onslaught of the Covid-19 virus, also fit the second definition of genocide wherein, the United Nations convention on genocide states: "Imposing conditions of life designed to cause mental or physical harm." In this instance, the Plaintiffs and Class Members submit that the emergency protocols, which have literally extended beyond the point of emergency, are without foundation and due process resulting in arbitrary conditions of life designed to cause mental and physical harm.

164. Furthermore, the Plaintiffs and Class Members state that the crime of apartheid is found in the protocols and regulations adopted by the Federal, Provincial and Municipal Governments, or member(s) therein. The crime of apartheid is defined as inhumane acts imposed on a people committed in the context of an institutionalize regime of systemic oppression and domination by one group over any other group and committed with the intention of maintaining that regime. The Plaintiffs and Class Members ask this Honourable to consider the application of the crime of apartheid as it relates to the imposition of the Covid-19 protocols through, restrictions, privileges and exemptions.

HARMS

165. The Plaintiffs and Class Members submit that as a result of the aforementioned wrongdoings, there are a number of associated harms. It is important to note that the harms are ongoing as the Covid-19 protocols remain in place and the vaccination rollout has just

begun. By ease of reference, the Plaintiffs and Class Members have divided the harms into inherent harms and actual harms.

COMMON ISSUES BETWEEN CLASS MEMBERS – *Inherent Harms*

166. A feature of egalitarian societies is that the powerful cannot have more rights than the commoner. Democracy rests on the guiding principle of the responsible, self-determined individual. Imposing measures that suppress individual decision-making process and instead, attempt to manipulate the public by implementing anxiety and horror-driven scenarios to cause Canadians to think, decide and live in a certain way, undermines the basic democratic principles upon which the Canadian society has been thriving in pre-Covid-19 times.

167. In this instance, the Plaintiffs and Class Members have defined 'inherent harms' as harms stemming directly from the Federal and Provincial Government, or member(s) therein, acting unilaterally in response to the recommendation to declare a pandemic by the World Health Organization without consideration of lawful authority and due process.

168. This usurpation of power poses a real threat to the Constitutional order in Canada. We are in a state of a Constitutional crisis. To not intervene would undermine the legal, political and social system in Canada permanently. The courts remain the necessary arbiter of these highly unprecedented processes wherein the usurpation of power by non-elected multinational corporations and international institutions have no legal function within the Constitutional framework of Canada, and the overreach of the Federal, Provincial and Municipal Governments, or member(s) therein, who are acting upon them.

169. The Federal and Provincial Government, or member(s) therein, continue to legislate based on the recommendations and guidelines of the World Health Organization and its affiliates.

As a result, the Canadian public is experiencing mass and indiscriminate containment of citizens restricting access to our economy, courts, parliament and livelihoods, medical and therapeutic care, along with the imposition of physica1 distancing and other restrictions and measures that have never before been implemented nor tested, nor have a clear and tested scientific or medical basis. It's simply unprecedented.

170. The Plaintiffs and Class Members append as Schedule 'A' an open letter to the Federal Bureau of Investigation, copied to the Canadian Security Intelligence Service, entitled "The Chinese Communist Party's Global Lockdown Fraud: request for expedited federal investigation into scientific fraud in COVID-19 public health policies." This letter opens with the following paragraph;

> We are writing this letter to request that a federal investigation be commenced and/or expedited regarding the scientific debate on major policy decisions during the COVID-19 crisis. In the course of our work, we have identified issues of a potentially criminal nature and believe this investigation necessary to ensure the interests of the public have been properly represented by those promoting certain pandemic policies.
> […]
> This letter is meant to call the attention of federal authorities in Australia, Canada, Germany, the United Kingdom, and the United States (the "Nations") to multiple points of evidence about the origin and historical precedent of lockdowns; the scientific literature and debate behind them; the provenance and quality of predominant COVID-19 testing protocols and models; the motivations, biases, and qualifications of certain prominent lockdown supporters; and the source of public-facing communications surrounding these policies.[115]

This letter set out clearly and concisely the inherent harms, and apparent agenda, that are being forced onto the Canadian public without authority and due process.

[115] Official Website: https://ccpgloballockdownfraud.medium.com/the-chinese-communist-partys-global-lockdown-fraud-88e1a7286c2b.

171. Based on the forgoing, the Plaintiffs and Class Members submit that there are a number of inherent harms that have arisen by the unilateral actions of our Governments, or member(s) therein, such as,

a) the suspension of fundamental rights and freedoms,

b) the loss of confidence in the government,

c) inability to assert individual rights and concerns,

d) loss of bodily autonomy, and

e) the breakdown of communication between the Government and the people,

All of which touch on the very fabric of our democratic system and the fundamental rights and freedoms inherent therein. This breakdown of social cohesion will last as long as this usurpation of power remains unchecked.

172. The Plaintiffs and Class Members submit that this Honourable Court can no longer deny the significance nor the weight of the harms being inflicted on the Canadian public as we move deeper into this extremely sensitive area of control and governing. Oversight, due diligence, due process and public debate is the minimal requirement needed to mitigate the inherent harms associated with this unprecedented situation; to which currently there has been none. This leaves the responsibility with our Courts. Although undoubtedly daunting, the Plaintiffs and Class Members can assure you that bringing this claim was no small step, however that does not make the discussion any less important or necessary in the face of the fundamental rights and freedoms at stake and the potential risk to the mind, body and health of the Canadian public which begs to be addressed in a fair and objective manner. The Plaintiffs and Class Members ask that this Honourable Court take that opportunity and begin this difficult discussion towards transparency and understanding.

Specific Harms

173. The Plaintiffs and Class Members will provide a detailed analysis of the actual harms that have occurred, and continue to occur, by the wrongdoings set out in the claim for the full record in the proceedings. In the interim, the following specific harms can be identified.

i. Stacy Amikwabi, as a small business owner residing on the Henvey Inlet First Nation reserve in Ontario, the Plaintiff has incurred damages from the lockdown to his business and livelihood as the Band Council responded to the Covid-Protocols being promoted and advanced by the Federal and Provincial Governments, or member(s) therein;

ii. Shawn Brennan, as an entrepreneur with a young family, has incurred specific damages from the lockdown which have resulted in financial loss;

iii. George Fayad, as a small business owner in Ottawa, has incurred financial damages from the lockdown to his business and livelihood;

iv. Joshua Alas-Wilson, a young adult living with Williams Syndrome, has been adversely affected by the lockdown and covid-protocols. His doctor-supported inability to wear a mask has impeded his quality and quantity of life.

v. Alisa Tojcic, a single mom of three young children living in an apartment in downtown Toronto on social assistance with ongoing medical concerns, has been, and continues to be, adversely affected by the protocols and lockdown in Toronto.

vi. Jane Doe, represents women who have given birth, or will give birth, during the Covid-19 protocols and subsequent vaccination rollout. The harms

associated with the protocols in this instance are associated with the risks to the health and welfare of the mother and child in light of the added physical and mental strain and stress of not having support present and a lack of informed consent or choice, based on unlawful protocols;

vii. John Doe, represents employees or employers who receive tickets from the Ministry of Labour for violating Covid-19 safety protocols on the job site such as not observing physical distancing or wearing face coverings. The monetary harm for contravention can reach $100,000.

174. The Plaintiffs and Class Members submit that as the wrongdoings are ongoing, the associated harms continue to unfold and evolve as further recommendations and guidelines are unlawfully implemented. On that basis, the Plaintiffs and Class Members submit that the question of harms remain open until the wrongdoings have stopped and the harms can begin to be truly measured.

CAUSES OF ACTION

175. The Plaintiffs and Class Members state that the wrongdoings and harms outlined herein are ongoing therefore there is an urgency to address the constitutional crisis outlined in this Class Action. In that regard, the Plaintiffs and Class Members advance the need for Interim Declaratory Relief on an urgent basis.

176. The Plaintiffs and Class Members will seek damages for breach of domestic torts such as negligence, breach of fiduciary duty, malfeasance in office, unlawful confinement, and conspiracy. The Plaintiffs and Class Members also seek damages for breaches of customary international law, prohibitions against crimes against humanity, cruel, inhuman or degrading behaviour, and torts of genocide and apartheid.

177. The Plaintiffs and Class Members are prepared to provide more particulars regarding causes of action immediately after a hearing on the constitutional challenges.

178. The Plaintiffs and Class Members claim damages, pecuniary and non-pecuniary, exemplary, special and punitive damages for the breaches listed in this claim. The Plaintiffs and Class Members have been harmed by these wrongdoings and are entitled to compensation.

DAMAGES

179. The Plaintiffs and Class Members claim damages as set out in the claim. As the harms are ongoing, the Plaintiffs can only provide estimates of damages presently. The Plaintiffs and Class Members will provide more details after a hearing on the constitutional challenges.

CONCLUSION

180. The Plaintiffs and Class Members submit that it is imperative that this Honourable Court take this opportunity to look deeply at the relationships and agendas that appear to be in the driver's seat of the Covid-19 global pandemic. These relationships have worked together for many years to create a complex web of smoke and mirrors causing confusion and diversion while more nefarious agendas appear to unfold in the background on the world stage. Although the answers may not be simple, that does not mean it isn't the time to begin to ask questions. To begin to connect dots and force the hard truths into the light.

181. The Plaintiffs and Class Members submit that the sobering words of Cardinal Raymond Leo Burke, of Wisconsin, U.S.A., a Cardinal of the Holy Roman Catholic Church, in

delivering a sermon to the faithful on December 13th, 2020, echoes this need for further discussion, oversight and intervention:[116]

> *It is with a troubled and heavy heart that I address you at a time when our nation is going through a crisis which is an attack on our free and democratic institutions."*
>
> *"... The worldwide spread of Marxist materialism which has already brought destruction and death to the lives of so many and which has threatened the foundations of our nation for decades and now seems to seize the governing power over our nation to attain economic gains so that we become dependent on the Chinese Communist Party an ideology totally opposed to Christian families ...*
>
> *"Most alarming crisis ... the mysterious Wuhan virus whose nature and prevention the mass media gives us daily conflicting information ... then it is used by certain forces inimical to families and freedom of nations to advance their evil agenda."*
>
> *"These forces tell us we are now subjects of the "Great Reset" the "New Normal" dictated to us by their manipulation of citizens and nations through ignorance and fear.*
>
> *"The input of the crisis in the world and church are profound for all of us."*
>
> And finally
>
> *"Worldly forces would isolate us to have us believe we are alone and dependent on secular forces which would make us slaves to their Godless and murderous* agenda."

182. The Plaintiffs and Class Members submit that their lawyers participate in a World Alliance with international lawyers, doctors and scientists who are expressing collective alarm and support in order to address the measures that have been adopted worldwide while being unsupported by lawful authority and due process. This World Alliance is available to assist this Honourable Court in addressing these highly sensitive and pressing issues.

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[116] https://www.youtube.com/watch?v=fWENECMqRGU.

183. The Plaintiffs and Class Members are effecting service outside of Ontario pursuant to Rule 17.04(1) and rely on Rule 17.02(f), (g), (h), of the *Rules of Civil Procedure*, R.R.O. 1990, Reg. 194.

184. The Plaintiffs and Class Members propose that the matter be tried in Ottawa.

Date: January 11, 2021

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SCHEDULE "A"

The mystery of lockdown exposed. So many people now should stand in the Dock and face trial for acts against the worlds citizens.

The Chinese Communist Party's Global Lockdown Fraud

Request for expedited federal investigation into scientific fraud in COVID-19 public health policies



The CCP's Global Lockdown Fraud

To:

Federal Bureau of Investigation
935 Pennsylvania Avenue NW
Washington, D.C. 20535

CC:

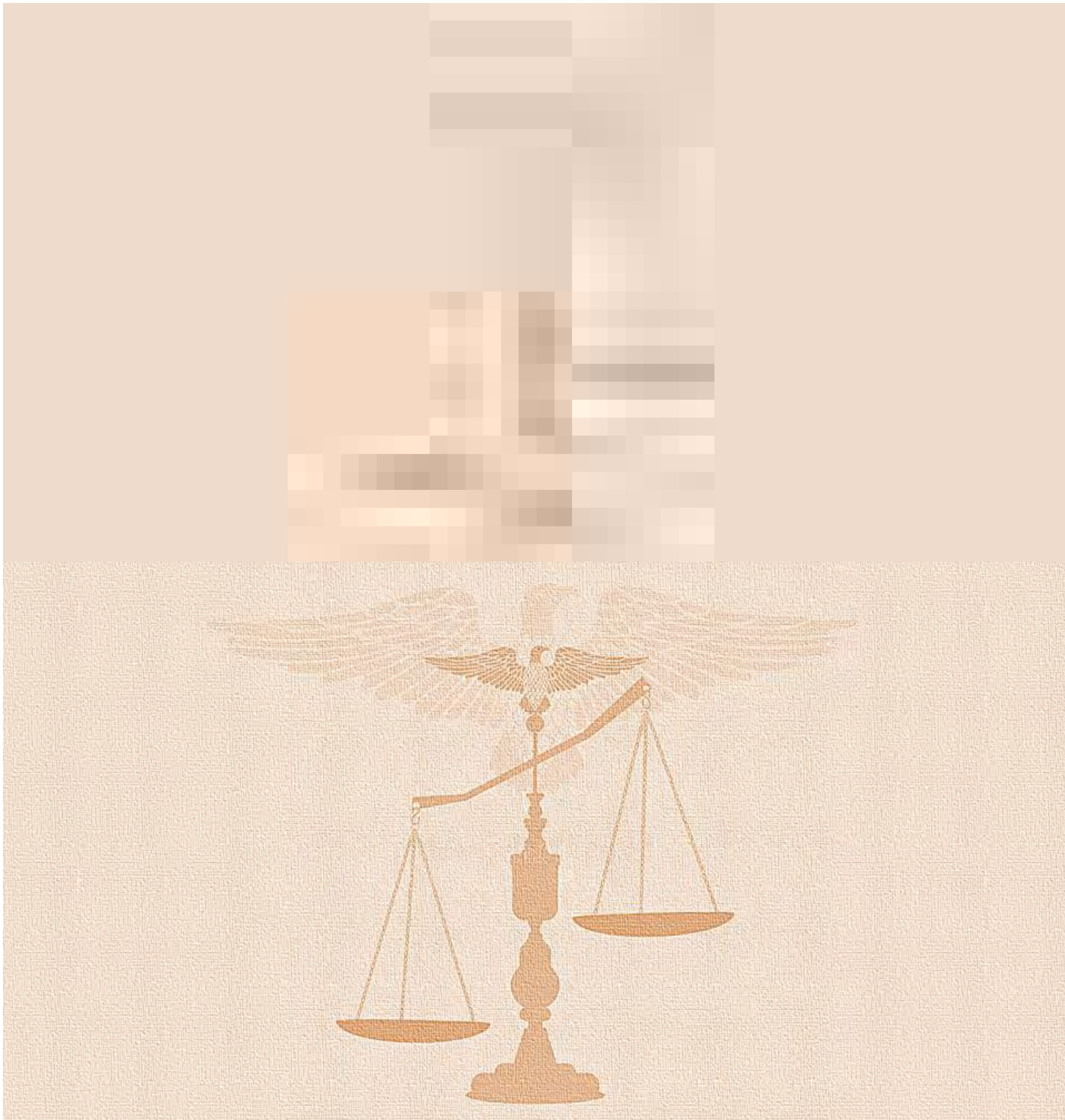
U.K. Security Service (MI5);
Australian Security Intelligence Organisation;
Canadian Security Intelligence Service;
Bundesnachrichtendienst;
U.S. Department of Justice

From:

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This open letter is available for download in PDF format at Scribd.



We are writing this letter to request that a federal investigation be commenced and/or expedited regarding the scientific debate on major policy decisions during the COVID-19 crisis. In the

course of our work, we have identified issues of a potentially criminal nature and believe this investigation necessary to ensure the interests of the public have been properly represented by those promoting certain pandemic policies.

During times of crisis, citizens naturally turn to the advice of those they perceive as experts. In early 2020, the public turned to the advice of scientific authorities when confronted with an apparent viral outbreak. Soon after, most nations followed the advice of prominent scientists and implemented restrictions commonly referred to as “lockdowns.” While the policies varied by jurisdiction, in general they involved restrictions on gatherings and movements and the closure of schools, businesses, and public places, inspired by those imposed by the Chinese Communist Party (CCP) in Hubei Province. The intervention of federal authorities with police power may be required to ensure that those who have promoted these lockdown policies have done so in good faith.

This letter is meant to call the attention of federal authorities in Australia, Canada, Germany, the United Kingdom, and the United States (the “Nations”) to multiple points of evidence about the origin and historical precedent of lockdowns; the scientific literature and debate behind them; the provenance and quality of predominant COVID-19 testing protocols and models; the motivations, biases, and qualifications of certain prominent lockdown supporters; and the source of public-facing communications surrounding these policies.

1. Lockdowns Originated on the Order of Xi Jinping, General Secretary of the Chinese Communist Party, and Were Propagated Into Global Policy by the World Health Organization With Little Analysis or Logic

Lockdown proponents have frequently justified their policies by comparing them to actions taken to combat the pandemic of Spanish influenza a century prior.[1] But a realistic examination of the mitigation efforts in response to Spanish influenza reveals that nothing remotely approximating lockdowns was ever imposed. In the words of Judge William S. Stickman, ruling in *Cnty. of Butler v. Wolf*,[2] citing the work of preeminent historians:

Although this nation [the United States] has faced many epidemics and pandemics and state and local governments have employed a variety of interventions in response, there have never previously been lockdowns of entire populations — much less for lengthy and indefinite periods of time…[3] While, unquestionably, states and local governments restricted certain activities for a limited period of time to mitigate the Spanish Flu, there is no record of any imposition of a population lockdown in response to that disease or any other in our history.

Not only are lockdowns historically unprecedented in response to any previous epidemic or pandemic in American history, but they are not so much as mentioned in recent guidance offered by the U.S. Centers for Disease Control and Prevention (“CDC”). Judge Stickman continues:

Indeed, even for a 'Very High Severity' pandemic (defined as one comparable to the Spanish Flu), the guidelines provide only that 'CDC recommends *voluntary* home isolation of ill persons,' and 'CDC might recommend *voluntary* home quarantine of exposed household members in areas where novel influenza circulates.' *Id.* at 32, Table 10 (emphasis added). This is a far, far cry from a statewide lockdown…[4]

The fact is that the lockdowns imposed across the United States in early 2020 in response to the COVID-19 pandemic are unprecedented in the history of our Commonwealth and our Country. They have never been used in response to any other disease in our history. They were not recommendations made by the CDC. They were unheard of by the people [of] this nation until just this year. It appears as though the imposition of *lockdowns in Wuhan and other areas of China — a nation unconstrained by concern for civil liberties and constitutional norms — started a domino effect where one country, and state, after another imposed draconian and hitherto untried measures on their citizens.* (emphasis added)

Judge Stickman's intuition regarding the real history of lockdowns is in line with the opinion of the foremost infectious disease scholars. Donald Henderson, the man widely credited with eradicating smallpox, wrote in 2006, "Experience has shown that communities faced with epidemics or other adverse events respond best and with the least anxiety when the normal social functioning of the community is least disrupted."[5] To our knowledge, no scientist ever publicly supported imposing lockdowns until Xi Jinping, General Secretary of the Chinese Communist Party (CCP), personally authorized the "unprecedented lockdown of Wuhan and other cities beginning on Jan. 23."[6]

General Secretary Xi is perhaps best known for the punishment of over one million CCP officials for "corruption,"[7] the elimination of term limits from China's constitution,[8] and, of course, the reeducation and "*quarantine*"[9] of over one million Uyghur Muslims and other minorities "*infected with extremism*"[10] throughout the regions of Xinjiang and Tibet, pursuant to the CCP's pet hybrid of public health and security policy: *fangkong* — the same policy that inspired Xi's lockdown of Hubei province.[11] General Secretary Xi later affirmed that he had issued these instructions to the CCP's Politburo Standing Committee on January 7, 2020,[12] but his instructions have never been revealed. Chinese business leader Ren Zhiqiang was sentenced to 18 years in prison[13] for an open letter in which he requested Xi's instructions be made public.[14]

When the lockdown of Hubei province began, the World Health Organization (WHO)'s representative in China noted that "trying to contain a city of 11 million people is new to science… The lockdown of 11 million people is unprecedented in public health history…"[15] Human rights observers also expressed concerns.[16] But those concerns didn't stop the WHO from effusively praising the CCP's "*unprecedented*" response just days after the lockdown began, and long before it had produced any results: "The measures China has taken are good not only for that country but also for the rest of the world."[17] WHO Director Tedros Adhanom added that he was personally "very impressed and encouraged by the president [Xi Jinping]'s detailed knowledge of the outbreak" and the next day praised China for "setting a new standard for outbreak response."[18]

By February 2020, the CCP had begun reporting an exponential decline in COVID-19 cases. In its February report, the WHO waxed rhapsodic about China's triumph:

General Secretary Xi Jinping personally directed and deployed the prevention and control work … China's *uncompromising* and *rigorous* use of non-pharmaceutical measures to contain transmission of the COVID-19 virus in multiple settings provides *vital lessons* for the global response"[19] (emphasis added).

Shortly thereafter, the WHO held a press conference during which Assistant Director-General Bruce Aylward — who later disconnected a live interview when asked to acknowledge Taiwan[20] — told the press: "What China has demonstrated is, *you have to do this*. If you do it, you can save lives and prevent thousands of cases of what is a very difficult disease."[21] (emphasis added). Two days later, in an interview for China Central Television (CCTV), Aylward put it bluntly: "*Copy China's response* to COVID-19."[22] (emphasis added).

The WHO's recommendations are notable for two reasons. First, the WHO's conclusion in its February report that this "rather unique and unprecedented public health response in China reversed the escalating cases"[23] exemplifies the fallacy of *post hoc, ergo propter hoc*. While it was possible that a more "flat" curve in Wuhan could be attributed to the CCP's lockdown, it was at least equally likely that Wuhan had simply witnessed the natural course of this "novel" pathogen. It should have been obvious that the mere issuance of a policy "unprecedented in public health history" did not automatically mean it was effective — especially given the WHO's own 2019 guidance for pandemic influenza did not advise border closures, mass contact tracing, or quarantine even of "exposed individuals" under any circumstance.[24]

Furthermore, the WHO did not even consider other countries' economic circumstances, demographics, or even their *number of COVID-19 cases* — which were very few in most of the world — before instructing the entire world that "you have to do this."[25] This conclusion by the world's foremost public health body was, at best, criminally negligent.[26]

Lockdowns are a Xi Jinping policy, and the significance of that fact cannot be overstated. The idea of locking down an entire state or country and forcibly shutting down its businesses and public places was never entertained, never discussed, and never implemented in any pandemic literature until it was done by General Secretary Xi in January 2020. Lockdowns were never tried before 2020 and never tested before 2020, even on a theoretical basis.[27] The idea of "lockdown" was brought into human history on the order of General Secretary Xi; it otherwise never would have entered the collective human imagination. Anytime anyone endorses a lockdown for any length of time, even a few minutes, they are endorsing a Xi Jinping policy. The remainder of this letter concerns *how* lockdowns were laundered into the world's go-to pandemic policy.

2. The Most Influential Institution for Covid-19 Models, Self-Described as "China's Best Academic Partner in the

West," Has Been by Far the Most Alarmist and Inaccurate Covid-19 Modeler

In February 2020, a team from Imperial College London led by physicist Neil Ferguson ran a computer model that played an outsized role in justifying lockdowns in most countries. Imperial College forecast a number of potential outcomes, including that, by October 2020, more than 500,000 people in Great Britain and 2.2 million people in the U.S. would die as a result of COVID-19, and recommended months of strict social distancing measures to prevent this outcome.[28] The model also predicted the United States could incur up to one million deaths even with "enhanced social distancing" guidelines, including "shielding the elderly."[29] In reality, by the end of October, according to the CDC and the United Kingdom National Health Service (NHS), approximately 230,000 deaths[30] in the United States and 37,000 deaths[31] in the United Kingdom had been attributed to COVID-19 (though deaths from all other leading causes — including heart disease, cancer, and influenza — mysteriously declined,[32] indicating that even these low counts from the CDC and NHS are vastly overstated).

A study by researchers at UCLA and the Institute for Health Metrics and Evaluation (IHME) compared the accuracy of various institutions' models predicting COVID-19 mortality.[33] Across all time periods, the models produced by Imperial College were measured to have far higher rates of error than the others — *always* erring on the side of being too high:

The 12-week median absolute percent errors (MAPE), reflecting models produced in July and August, ranged from 22.4% for the SIK-J Alpha model, to 79.9% for the Imperial model… The Delphi and LANL models from July underestimated mortality, with median percent errors of -5.6% and -8.3% at 6 weeks respectively, while Imperial tended to overestimate (+47.7%), and the remaining models were relatively unbiased… The Imperial model had *larger errors, about 5-fold higher* than other models by six weeks. This appears to be largely driven by the aforementioned *tendency to overestimate mortality*. At twelve weeks, MAPE values were lowest for the IHME-MS-SEIR (23.7%) model, while the Imperial model had the most elevated MAPE (98.8%)… In the most current models, the 6-week MAPE across models was 7.2%.

Imperial's inaccuracy continued unabated. In October 2020, Imperial College's model predicted the U.K. would experience 2,000 deaths per day by mid-December.[34] In fact, deaths per day in the U.K. never reached 400, per NHS.[35]

Five years earlier, on October 21, 2015, General Secretary Xi personally visited Imperial College London for the announcement of "a series of new UK-China education and research collaborations" including "nanotechnology, bioengineering… and public health."[36] This was the only trip Xi ever made to the U.K. as General Secretary; the trip lasted just four days and involved just one university: Imperial College London.[37] In a speech welcoming General Secretary Xi and his wife, Peng Liyuan, a goodwill ambassador to the WHO, Imperial College President Alice Gast addressed the Chancellor of the Exchequer:

Chancellor, you have said that you aim to make the U.K. 'China's best partner in the west.' Imperial College London strives to be just that, *China's best academic partner in the west*… As

China's top research partner in the U.K., Imperial's academics and students benefit from collaboration on a daily basis.[38] (emphasis added)

In 2019, Gast became part of the notably pro-China[39] World Economic Forum's AI Council along with Chinese AI Expert and venture capitalist Kai-Fu Lee, and to this day, Imperial College continues to advertise itself as "UK's number one university collaborator with Chinese research institutions."[40]

In March 2020, Imperial College produced a report titled "Evidence of initial success for China exiting COVID-19 social distancing policy after achieving containment," concluding:

For the first time since the outbreak began there have been no new confirmed cases caused by local transmission in China reported for five consecutive days up to 23 March 2020. This is an indication that the social distancing measures enacted in China have led to control of COVID-19 in China… after very intense social distancing which resulted in containment, China has successfully exited their stringent social distancing policy to some degree.[41]

Imperial College had no way of knowing if this was, in fact, true — failing to discover cases does not mean they do not exist, particularly with a virus that is fatal to hardly anyone except the most vulnerable, and a regime with a long history of fraud— and its conclusion directly contradicted that of the U.S. intelligence community around the same time that China had intentionally misrepresented its coronavirus numbers.[42] In a December interview, Neil Ferguson recalled how China had inspired his lockdown recommendations to the U.K.'s Scientific Advisory Group for Emergencies (SAGE):

I think people's sense of what is possible in terms of control changed quite dramatically between January and March… It's a communist one party state, we said. We couldn't get away with it in Europe, we thought… And then Italy did it. And we realised we could… If China had not done it, the year would have been very different.[43]

In a time of panic, it's natural for the public to focus on the worst possible outcomes. Thus, a prestigious institution producing particularly alarmist models can have an outsized impact on political discourse. In this case, the institution in question not only consistently and egregiously erred in just one direction — the "tendency to overestimate mortality" — but also had a special relationship with China as its "best academic partner in the west."

3. Deadly Recommendations for Early Mechanical Ventilation Came from China

In early March 2020, the WHO released COVID-19 provider guidance documents to healthcare workers.[44] The guidance recommended escalating quickly to mechanical ventilation as an early intervention for treating COVID-19 patients, a departure from past experience during respiratory-virus epidemics.[45] In doing so, they cited the guidance being presented by Chinese journal articles, which published papers in January and February claiming that "*Chinese expert consensus*" called for "invasive mechanical ventilation" as the "first choice" for people with

moderate to severe respiratory distress,[46] in part to protect medical staff. As the Wall Street Journal later reported:

Last spring, doctors put patients on ventilators partly to limit contagion at a time when it was less clear how the virus spread, when protective masks and gowns were in short supply. Doctors could have employed other kinds of breathing support devices that don't require risky sedation, but early reports suggested patients using them could spray dangerous amounts of virus into the air, said Theodore Iwashyna, a critical-care physician at University of Michigan and Department of Veterans Affairs hospitals in Ann Arbor, Mich.

At the time, he said, doctors and nurses feared the virus would spread through hospitals. "*We were intubating sick patients very early. Not for the patients' benefit, but in order to control the epidemic* and to save other patients," Dr. Iwashyna said "That felt awful."[47] (emphasis added)

In New York and other cities, early and often ventilator use became a common theme, and it had devastating consequences for patients.[48] On March 31, 2020, Dr. Cameron Kyle-Sidell, who had been caring for ICU patients at one of the hardest-hit hospitals in New York City, acted as an early whistleblower, sounding the alarm about the ventilator issue in a widely-shared video:

We are operating under a medical paradigm that is untrue… I fear that this misguided treatment will lead to a tremendous amount of harm to a great number of people in a very short time… I don't know the final answer to this disease, but I'm quite sure that a ventilator is not it… This method being widely adopted at this very moment at every hospital in the country … is actually doing more harm than good.[49]

An April Reuters interview with dozens of medical specialists made it clear that mechanical ventilator overuse had become a global issue: "Many highlighted the risks from using the most invasive types of them — mechanical ventilators — too early or too frequently, or from non-specialists using them without proper training in overwhelmed hospitals."[50]

By May 2020, it was common knowledge in the medical community that early ventilator use was hurting, not helping, COVID-19 patients, and that less invasive measures were in fact very effective in assisting recoveries.[51] A New York City study found a *97.2% mortality rate* among those over age 65 who received mechanical ventilation.[52] The "early action" ventilator guidance that the WHO distributed to the world killed thousands of innocent patients; the WHO obtained that guidance from China.

4. The World's Predominant, Wildly-Inaccurate PCR Testing Protocols Are Based on Incomplete, Theoretical Genome Sequences Supplied by China

Virologists Victor Corman and Christian Drosten led the exceptionally-rapid creation of the first COVID-19 PCR test (the "Corman-Drosten Protocol");[53] it is now the most commonly-used testing protocol in the world for detecting the SARS-CoV-2 virus which may, in certain cases, lead to the disease COVID-19. (As discussed *infra*, the Court of Appeal of Lisbon concluded that

this PCR test was producing as many as 97% false positives). Corman and Drosten were provided with the *in silico* (theoretical) genome sequences used to create their PCR protocol by Chinese scientists including Yong-Zhen Zhang and Shi Zhengli, Director at the Wuhan Institute of Virology.[54] (These genome sequences were then posted to the open-source depository Virological.org on January 10, 2020). The Corman-Drosten Protocol was submitted to the WHO on January 13,[55] eight days *prior* to the date it was submitted to the medical journal Eurosurveillance for "peer review."[56]

The WHO released the Corman-Drosten Protocol on January 21, the same day it was submitted to Eurosurveillance.[57] Drosten sits on the board of Eurosurveillance, a conflict of interest.[58] The Corman-Drosten Protocol was accepted[59] by Eurosurveillance the *very next* day, January 22 (the same day the WHO confirmed human-to-human transmission),[60] an extraordinarily quick turnaround; peer review for scientific journals is an intensive process requiring identification of, and action by, external reviewers, which typically takes weeks to months. Of all 1,595 publications at Eurosurveillance since 2015, not one other research paper was reviewed and accepted in fewer than 20 days.[61] Eurosurveillance's peer review process also requires an author declaration that no conflicts of interest exist, which was, in this case, a false statement.[62] This extraordinarily quick turnaround made it impossible for any other PCR protocol to be published before the Corman-Drosten Protocol, which was published on PubMed on January 23,[63] giving it a valuable "first-mover" advantage ensuring that it became the predominant PCR protocol in the world.

The molecular biologist Pieter Borger and his team submitted a retraction request for the Corman-Drosten PCR protocol.[64] According to Borger's report, the Corman-Drosten PCR test workflow contains multiple, fatal errors. The most glaring issue is the fact that, at the time the protocol was submitted, there was no good reason to believe widespread PCR testing would even be necessary:

The authors introduce the background for their scientific work as: "The ongoing outbreak of the recently emerged novel coronavirus (2019-nCoV) poses a challenge for public health laboratories as virus isolates are unavailable while there is growing evidence that the outbreak is more widespread than initially thought, and international spread through travelers does already occur.

According to BBC News[65] and Google Statistics[66] there were 6 deaths world-wide on January 21st 2020 — the day when the manuscript was submitted. Why did the authors *assume a challenge for public health laboratories while there was no substantial evidence at that time to indicate that the outbreak was more widespread than initially thought?* (emphasis added)

Borger's report goes on to specify ten major flaws with the Corman-Drosten protocol, the biggest issue being the fact that the entire test is based on *in silico* (theoretical) sequences supplied by China:

The first and major issue is that the novel Coronavirus SARS-CoV-2 (in the publication named 2019-nCoV and in February 2020 named SARS-CoV-2 by an international consortium of virus experts) is based on *in silico* sequences, supplied by a laboratory in China,[67] because at the

time neither control material of infectious ("live") or inactivated SARS-CoV-2 nor isolated genomic RNA of the virus was available to the authors. To date no validation has been performed by the authorship based on isolated SARS-CoV-2 viruses or full length RNA thereof.

In addition, the primers and probes in Drosten's protocol are incomplete and non-specific; the primer concentrations are four to five times too high; the GC content (connection strength) is far too low; the annealing temperature difference in primer pairs is up to five times too high; the PCR products have not been validated at the molecular level, rendering the test useless as a specific diagnostic tool to identify SARS-CoV-2; and — given the protocol was accepted for publication just one day after it was submitted to Eurosurveillance — it was obviously never subjected to any meaningful peer review.

Corman and Drosten's PCR protocol thus has every indications of being fraudulent.

In June, a peer-reviewed study was published comparing the accuracy of the COVID-19 PCR test protocols on the short list recommended by the WHO. The PCR protocol developed by the CDC (the N2 US CDC protocol)[68] — likewise based on *in silico* genome sequences supplied by China — fared little better than the Corman-Drosten protocol:

The E Charité [Corman-Drosten] and N2 US CDC assays were positive for all specimens, including negative samples and negative controls (water).[69]

Together, these two PCR protocols account for the vast majority of COVID-19 PCR tests conducted in the Nations.[70] Both rely on *in silico* sequences from China, and both produce wildly inaccurate results, testing positive for all specimens including negative samples and plain water.

5. Predominant, Excessive PCR Testing Protocols Came from China

In accordance with recommendations by the WHO and other public health authorities, countless laboratories have engaged in mass PCR testing for the SARS-CoV-2 virus.[71] Fundamental to PCR testing is the concept of "cycle thresholds." The PCR test amplifies genetic matter from a virus in cycles; the fewer cycles required, the greater the amount of virus, or viral load, in the sample. The greater the viral load, the more likely the patient is to be contagious. Thus, the higher the PCR cycle threshold, the lower the amount of viral load needed to trigger a positive PCR test.

If the PCR cycle threshold indicating a "positive" is set too high, a positive result may not even indicate any meaningful amount of live viral particles. As Dr. Anthony Fauci mentioned in a July 2020 interview, a cycle threshold of 35 or more should not be considered a positive result:

What is now sort of evolving into a bit of a standard … if you get a cycle threshold of 35 or more … the chances of it being replication-confident are minuscule… So, I think if somebody does

come in with *37, 38, even 36, you got to say, you know, it's just dead nucleotides, period.*[72] (emphasis added)

The WHO published its currently-outstanding guidance on laboratory testing for COVID-19 on March 19, 2020.[73] The WHO's guidance contained only three studies discussing PCR cycle thresholds. All three studies[74] are from China and use cycle thresholds from 37 to 40: "A cycle threshold value (Ct-value) less than 37 was defined as a positive test, and a Ct-value of 40 or more was defined as a negative test."[75]

As described by the New York Times, most laboratories and manufacturers in the United States now set their cutoff for a positive PCR test from 37 to 40 cycle thresholds: "Most tests set the limit at 40, a few at 37. This means that you are positive for the coronavirus if the test process required up to 40 cycles, or 37, to detect the virus."[76] At 37 cycles, any viral RNA or DNA will have been amplified over 68 billion times, and at 40 cycles it will have been amplified over 500 billion times.

Doctors interviewed by the New York Times agreed with Dr. Fauci that anything above 35 cycle thresholds is too sensitive. "A more reasonable cutoff would be 30 to 35," said Juliet Morrison, virologist at UC Riverside. Dr. Michael Mina, epidemiologist at the Harvard T.H. Chan School of Public Health, said he would set the figure at 30, or even less. Using current testing standards with 37 to 40 cycle thresholds:

In three sets of testing data that include cycle thresholds, compiled by officials in Massachusetts, New York and Nevada, up to 90 percent of people testing positive carried barely any virus, a review by The Times found… In Massachusetts, from *85 to 90 percent* of people who tested positive in July with a cycle threshold of 40 would have been deemed negative if the threshold were 30 cycles, Dr. Mina said. 'I would say that none of those people should be contact-traced, not one,' he said.[77] (emphasis added).

In a recent ruling, the Court of Appeal of Lisbon concluded: "In view of current scientific evidence, this test shows itself to be unable to determine beyond reasonable doubt that such positivity corresponds, in fact, to the infection of a person by the SARS-CoV-2 virus."[78] The two most important reasons for this, said the judges, are that, "the test's reliability depends on the number of cycles used'' and that "the test's reliability depends on the viral load present."[79]

The court cited a study conducted by "some of the leading European and world specialists," showing that if someone tested positive for COVID-19 at a cycle threshold of 35 or higher, the chance of that person actually being infected is less than 3%, and that "the probability of… receiving a false positive is 97% or higher."[80]

To summarize, based on guidance issued by the WHO citing three studies from China, laboratories and manufacturers across the United States and many other countries are using a PCR cycle threshold of 37 to 40 for COVID-19 PCR tests that were created using *in silico* genome sequences supplied by a laboratory in China, pursuant to which positive COVID-19 case counts have been inflated as much as ten- to thirty-fold.[81]

6. Studies Showing Significant Asymptomatic Transmission, the Only Scientific Basis for Lockdowns of Healthy Individuals, Came from China

Underpinning the policy of "lockdown" is the scientific concept of "asymptomatic spread." According to the WHO, "Early data from China suggested that people without symptoms could infect others."[82] This idea of asymptomatic spread was reflected in the WHO's February report.[83] According to this concept, healthy individuals, or "silent spreaders" might be responsible for a significant number of SARS-CoV-2 transmissions.[84] The idea of setting out to stop asymptomatic spread was a significant departure from prevailing public health guidance and experience during prior respiratory-virus pandemics.[85]

The concept of significant asymptomatic spread was believed to be a novel and unique feature of SARS-CoV-2 based on several studies performed in China.[86] Multiple studies from other countries could not find any transmission of SARS-CoV-2 from asymptomatic individuals.[87]

A paper from McGill University concluded that "transmission in the asymptomatic period was documented in numerous studies," but every one of those studies was conducted in China; where studies outside of China have tried to replicate these findings, they have failed.[88] An Italian study concluded that two asymptomatic individuals who tested positive had been infected by two other asymptomatic individuals, but this was based on 2,800 PCR tests; given the false-positive rate discussed above, the conclusion is dubious.[89] An influential study from Brunei Darussalam found significant asymptomatic spread,[90] but its findings are considerably weakened by a poor case definition; its two findings of asymptomatic spread were that of a young girl with no symptoms who allegedly spread SARS-CoV-2 to her teacher who had "a mild cough on one day," and a father who remained asymptomatic but whose wife briefly had a runny nose and whose baby also had a mild cough one day.[91]

A German study co-authored by Christian Drosten claimed to have found "Transmission of 2019-nCoV Infection from an Asymptomatic Contact in Germany,"[92] but the researchers didn't actually speak to the woman before they published the paper, and officials later confirmed that she did, in fact, have symptoms while in Germany.[93]

Absent this concept of significant asymptomatic spread, there is no scientific case for locking down healthy persons. This concept of significant asymptomatic transmission of SARS-CoV-2, and the studies backing it, came from China.

7. The CCP Engaged in an Early, Broad, Systematic, and Global Propaganda Campaign to Promote Its Lockdown Response

After concluding the CCP's lockdowns had "reversed the escalating cases" in China, the WHO was not alone in imploring the world to "Copy China's response to COVID-19." Beginning the

same day the CCP locked down Hubei province, "leaked" videos from Wuhan began flooding international social media sites including Facebook, Twitter, and YouTube — all of which are blocked in China — purporting to show the horrors of Wuhan's epidemic and the seriousness of its lockdown, in scenes likened to *Zombieland* and *The Walking Dead*.[94] Official Chinese accounts widely shared an image of a hospital wing supposedly constructed in one day, but which actually showed an apartment 600 miles away.[95]

Then, beginning in March 2020, the entire world was bombarded with propaganda extolling the virtues of China's heavy-handed approach.[96] Chinese state media bought numerous Facebook ads[97] advertising China's pandemic response (all of which ran without Facebook's required political disclaimer), and began erroneously describing "herd immunity" — the inevitable endpoint of every epidemic either by naturally-acquired immunity[98] or vaccination — as a "strategy" violating "human rights."[99] Sweden, whose leaders were unique in foregoing lockdowns, became a primary target of the CCP's propaganda campaign.[100] In the words of China's state-run Global Times:

Chinese analysts and netizens doubt herd immunity and called it a violation of human rights, citing high mortality in the country compared to other Northern European countries. "So-called human rights, democracy, freedom are heading in the wrong direction in Sweden, and countries that are extremely irresponsible do not deserve to be China's friend …"[101]

That was, of course, before the WHO adopted the bold, contradictory strategy of attempting to rewrite the historical definition of herd immunity wholesale. As recently as June 2020, the WHO's definition of herd immunity had properly included "immunity developed through previous infection"—but on October 15, 2020, the WHO effectively erased the eons-long history of naturally-acquired immunity from its website:

'Herd immunity', also known as 'population immunity', is a concept used for vaccination, in which a population can be protected from a certain virus if a threshold of vaccination is reached.

Herd immunity is achieved by protecting people from a virus, *not* by exposing them to it.[102] (emphasis added)

China's official spokesperson, Hua Chunying, posted a video of a 7-year-old girl reciting the importance of strict social distancing among children.[103] Simultaneously, hundreds of thousands of clandestine social media posts, which were later flagged as state-sponsored, expressed admiration for China's lockdowns and longed for governments around the world to emulate them, while denigrating governments and world leaders who failed to follow suit;[104] governments including, but not limited to: Nigeria,[105] Ghana,[106] South Africa,[107] Namibia,[108] Kenya,[109] France,[110] Spain,[111] Colombia,[112] Brazil,[113] Argentina,[114] Canada,[115] Australia,[116] India,[117] Germany,[118] the United Kingdom,[119] and the United States.[120] Not only is this very poor global citizenship, but especially in light of the dubious science discussed above, it's worth wondering whether these social media posts were intended to popularize lockdowns as the end in themselves.[121]

When Italy became the first country outside China to lock down, Chinese experts arrived on March 12 and two days later advised a tighter lockdown: "There are still too many people and behaviors on the street to improve."[122] On March 19, they repeated that Italy's lockdown was "not strict enough." "Here in Milan, the hardest hit area by COVID-19, there isn't a very strict lockdown … We need every citizen to be involved in the fight of COVID-19 and follow this policy."[123]

Chinese company DJI donated drones to 22 U.S. states to help enforce lockdown rules.[124] Months later, DJI was blacklisted by the U.S. for having "enabled wide-scale human rights abuses within China through abusive genetic collection and analysis or high-technology surveillance, and/or facilitated the export of items by China that aid repressive regimes …"[125] On July 7, FBI Director Christopher Wray disclosed that the CCP even specifically approached local politicians to endorse its pandemic response:

[W]e have heard from federal, state, and even local officials that Chinese diplomats are aggressively urging support for China's handling of the COVID-19 crisis. Yes, this is happening at both the federal and state levels. Not that long ago, we had a state senator who was recently even asked to introduce a resolution supporting China's response to the pandemic.[126]

China has financial stakes in virtually every top media outlet.[127] With regard to complex issues like lockdowns, China's influence can collectively tip these media entities in a dangerous direction, such as encouraging countries to copy China's response to COVID-19.[128] The CCP has shaped the media's scientific narratives by consistently promoting the falsehood that "China controlled the virus,"[129] which is, of course, a baldfaced lie.[130] Nonetheless, by encouraging mainstream publications to repeat the lie that "China controlled the virus," the CCP has normalized this lie and ensured its forged data remains integral to scientific discourse.[131] Meanwhile, the CCP began closely monitoring Chinese academic publications on COVID-19.[132]

The significance of China's global lockdown propaganda campaign is the intent behind it. While the scientific issues described above — criminal negligence by the WHO, alarmist mortality models, dubious PCR tests, and bad studies on asymptomatic transmission — could theoretically be attributed to incompetence, the CCP's propaganda is evidence of deliberation. Sloppy science may be professionally shameful, but it is neither a crime nor a moral failing. The possibility of corruption and fraud, on the other hand, is another matter.

8. Many Prominent Pro-Lockdown Scientists Show Conspicuous Pro-China Bias

Not only were lockdowns laundered into science with a shocking lack of scientific debate, but many scientists have shown an unusual deference to China in evaluating the continuation of lockdown policies. These scientists have continuously praised China, and many appear to be operating on the assumption that China has, in fact, eliminated domestic COVID-19 cases as the CCP claims, when in fact this claim is a lie, as confirmed by the intelligence community.[133]

Needless to say, promoting major public policy decisions based on this mistaken assumption can have devastating consequences.

In a May 2020 interview for China Central Television, Richard Horton, editor-in-chief of the esteemed medical journal The Lancet, emphatically praised China's lockdowns:

It was not only the right thing to do, but it also showed other countries how they should respond in the face of such an acute threat. So, I think we have a great deal to thank China for …[134]

In July, Horton reiterated his gratitude toward China, tweeting: "Indeed. China should not be 'blamed'. In my view, we should thank Chinese scientists and health workers for their incredibly selfless commitment to attacking this outbreak. They deserve our unconditional gratitude."[135] And in August, Horton doubled down again in a full-throated piece that had surprisingly little to do with health:

The "century of humiliation," when China was dominated by a colonially-minded west and Japan, only came to an end with the Communist victory in the civil war in 1949 … Every contemporary Chinese leader, including Xi Jinping, has seen their task as protecting the territorial security won by Mao and the economic security achieved by Deng.[136]

On October 8, the Lancet published a ringing endorsement of China's pandemic response: *China's successful control of COVID-19.*[137] This article was met with high praise by Chen Weihua, China Daily EU Bureau Chief:

Despite ignorance by many in the West, this article by The Lancet is a powerful endorsement of China's successful pandemic response. Hate to read stories by those paparazzi journalists who are experts at spinning but have little knowledge of science.[138]

Chinese scientists later submitted an article to The Lancet arguing that SARS-CoV-2 originated in India, in the midst of ongoing border skirmishes with India.[139] Just weeks later, however, the party line changed again amid economic tensions with Australia, and Global Times claimed the coronavirus may have come from Australia.[140]

William A. Haseltine, Chairman of the Board of the US-China Health Summit since 2015, has also reserved great praise for China. In October 2020, China Daily syndicated a column from Haseltine in which he towed the CCP's party line on Sweden, chastising the country for choosing to "forego lockdowns" and base its strategy on "herd immunity," for which he falsely states that Sweden's "COVID-19 infection and fatality rates were among the world's highest":

But to base a pandemic-response strategy on the assumption that herd immunity is inevitable vaccine or no vaccine is to afford a virus a path of least resistance. That was the case in Sweden, where policymakers decided to forego lockdowns and business closures in favor of more lenient advisories on mask-wearing and social distancing. Unsurprisingly, Sweden's subsequent COVID-19 infection and fatality rates were among the world's highest.[141]

Early in the pandemic, on March 25, Haseltine also praised China's measures in contrast to the United States, most of which had yet to impose lockdowns: "The measures the US is taking to control Covid-19 are far inferior to what was done in China according to @JNBPage in @WSJ — http://ow.ly/BS5R50yVDV2. For more details see an interview quarantine of an American in Shanghai — http://ow.ly/nz3050yVDXO."[142] Later that day, Haseltine continued: "Two months of lockdown in Hubei province in China has been lifted, although Wuhan remains under quarantine until April 8. This is an important moment, and testament to the effectiveness of containment measures."[143] Haseltine praised China again on May 20: "It is possible to eliminate Covid without effective drugs or vaccines. This is how they did it in Wuhan, China."[144]

On June 4, Haseltine again compared the U.S. negatively to China: "The steps China has taken to protect its population through testing and tracking is truly impressive. The US, on the other hand, is failing."[145] And again on September 15: "Has the US has done [sic] all it can to control Covid-19? Covid can be contained without a vaccine or drug. China now has near zero new infections. ACCESS Health & the @RockefellerFdn explored how they did it with the use of digital technologies. http://ow.ly/I4Ch50BrEpJ."[146]

Tom Frieden, former director of the CDC, is another prominent advocate of COVID-19 lockdowns. In 2015, "Frieden praised the public health partnership between China and the United States," according to Global Times.[147] In 2017, Frieden joined China in backing Tedros Adhanom as director of the WHO over the United Kingdom's eminently-qualified David Nabarro: "Tedros is an excellent choice to lead WHO. He succeeded in Ethiopia, making remarkable health progress…"[148] To the contrary, as was widely-known at the time, Tedros had helped Ethiopia's regime cover up three cholera epidemics during his time as Ethiopia's Minister of Public Health.[149] As a senior member of the Tigray People's Liberation Front (TPLF), designated a terrorist organization by the United States in the 1990s, Tedros "was a crucial decision maker in relation to security service actions that included killing, arbitrarily detaining and torturing Ethiopians" and was "personally responsible for brutal repression of the Amhara people, using aid money selectively to starve them out and deny them access to basic services," — war crimes for which charges of genocide have recently been submitted against him at the International Criminal Court at the Hague.[150]

Frieden traveled extensively throughout China in 2018 and 2019 for public health collaborations, and he has heaped praise on China since the COVID-19 crisis began.[151] Frieden praised China's response early on, writing for CNN on February 25: "China's extraordinary cordon of Hubei province and other areas bought the world at least a month of lead time to prepare."[152] In an April interview, Frieden told China Global Television (CGTN): "There's a lot the world can learn from China on stopping COVID-19."[153]

On March 17, Frieden urged the U.S. to emulate China's expansion of hospital capacity: "When @voxdotcom posted this yesterday I thought hospitals might need to triple their beds and ventilators for pts with #COVID19. Now data suggests we may need as much as 10x more. China built 1K bed hospitals in 8 days, urgent action needed in US now."[154]

On April 1, Frieden tweeted the same words three times, praising China and urging the U.S. to ramp up its response: "I'm angry. Friends & neighbors sick & dying. 2.9: days Wuhan's action bought China: https://bit.ly/3bCxFJg. 2.9: number of MONTHS squandered by US not ramping up protection of HCW, critical care, testing, contact tracing, isolation, quarantine. Roadmap: https://bit.ly/2R3RtgW."[155]

In August, Frieden praised China several times, contrasting its "success" with that of the U.S. On August 10: "Meanwhile in China. They report they can now do 4.8M PCR tests/day. Schools are opening and staying open. Mask-wearing is, where appropriate, nearly universal. Last week, they had an average of 34 cases/day. That's a case rate less than 1/5,000th that of the US."[156] On August 15: "This reflection from an American teaching in Chengdu — where Covid lockdowns were strictly enforced — examines the nuances of life in China and how the country was able to crush the curve."[157] And on August 16: "Thoughts about huge, unmasked crowds at festivals in Wuhan!? Well, that's the reward for crushing the curve — you get back to near pre-Covid reality. But that's probably not a reasonable goal for most places, where simmering control is a realistic best-case scenario."[158] And on August 18: "China reported a case rate less than 1/5,000th of the US'. It's possible for us to control Covid too if Americans work together and fully support public health."[159]

While these individuals are unique in their pro-China, pro-lockdown bias, as scientists they're far from alone in their apparent ties to the CCP. In June, the National Institutes of Health (NIH) disclosed that 189 of its grantees had received undisclosed funding from foreign governments.[160] In 93% of cases, including that of Charles Lieber, chair of Harvard's chemistry department, the undisclosed funding came from China.[161] The co-founders of CanSino Biologics, a Chinese vaccine company collaborating with Canada, were found to be members of the CCP's Thousand Talents Plan for co-opting and incentivizing scientists to transfer research and knowledge to China.[162] According to the Harvard Crimson, the largest gift in the history of Harvard's Chan School of Public Health came in part from a "pawn of the CCP," a "cheerleader for a government responsible for significant humanitarian crises" through a series of shell companies, the largest of which was named in the Panama Papers.[163]

There is nothing immoral or illegal about merely being wrong. But given the magnitude of the decisions being made during the COVID-19 crisis, if even a handful of influential scientists are cross-incentivized to support lockdowns regardless of any real data or results, this can have an outsized impact on both public opinion and policy.

9. Many Other Influential Lockdown Supporters Are Both Woefully Unqualified to Be Advising World Leaders on Pandemic Policy and Often Show Conspicuous Pro-China Bias

In addition to the many scientists with ties to China, a number of woefully unqualified individuals have held themselves out to the public and politicians as experts with regard to

COVID-19 epidemiology and lockdowns, when in fact their backgrounds reveal them to have no such expertise. Many of these, too, have shown unusual deference to China.

On January 25, 2020, Eric Feigl-Ding, an epidemiologist in Harvard's nutrition department with little background in infectious disease, wrote, "HOLY MOTHER OF GOD, the new coronavirus is a 3.8!!! How bad is that reproductive R0 value? It is thermonuclear pandemic level bad."[164] This was the first of a months-long series of dubious, but widely-shared, alarmist tweets by the previously unknown Ding, by virtue of which he gained hundreds of thousands of Twitter followers and became one of the leading advocates of strict COVID-19 mandates, despite his evident lack of qualifications.[165]

Ding is an alumnus of the World Economic Forum's Global Shapers, a group of young people that considers Taiwan a part of Greater China[166] and has campaigned during the COVID-19 crisis to share "their personal experiences of combating the coronavirus in their cities and of adapting to a new normal."[167] His enormous Twitter following irked many of his colleagues, prompting prominent Harvard epidemiologist Marc Lipsitch to denounce him as a charlatan: "OK lots of people think this is an intramural tiff. In the sense that we have been working @CCDD_HSPH for a decade and at @HarvardEpi for 25y to establish ID epidemiology as a field of excellence & we don't like a charlatan exploiting a tenuous connection for self-promotion, yes."[168]

Columbia virologist Angela Rasmussen agreed with Dr. Lipsitch's assessment: "Eric Feigl-Ding is a charlatan. If Dr. Lipsitch sounds condescending, it's because EFD has repeatedly claimed expertise he doesn't have in order to get attention. He sensationalizes data and distributes outright misinformation. He's harmful to public health and I disdain that too."[169]

These denunciations by Drs. Rasmussen and Lipsitch are noteworthy in that both have supported limited lockdowns and criticized both pro- and anti-lockdown scientists and commentators. However, their denunciations of Ding have not slowed down his Twitter campaign, and he has continued to present himself in attire worn by a medical doctor, completely inappropriate to his background as a nutritionist.[170]

Tomas Pueyo is an engineer and MBA with no background in health or epidemiology who came to sudden fame for a March 10 article on the self-publishing site Medium titled "Coronavirus: Why You Must Act Now," in which he implored leaders around the world to implement lockdowns on China's model to counter rising COVID-19 cases. "The total number of cases grew exponentially *until China contained it*. But then, it leaked outside, and now it's a pandemic that nobody can stop."[171] (emphasis added)

Pueyo's article quickly went viral and was shared hundreds of thousands of times, including by many celebrities.[172] After it went viral, Pueyo went on tour advising state legislators on implementing lockdowns.[173]

Not only was Pueyo unqualified to be dispatching this type of epidemiological advice to world leaders, but Pueyo's March 10 article contains a number of red flags. First, Pueyo several times refers to the coronavirus as a "pandemic." However, as of March 10, the WHO had not yet

declared the coronavirus a pandemic,[174] and per the article, cases accounted for less than 0.0015% of the world's population. In the article, Pueyo then goes on to implore leaders:

But in 2–4 weeks, when the *entire world* is in lockdown, when the few precious days of social distancing you will have enabled will have saved lives, people won't criticize you anymore: They will thank you for making the right decision. (emphasis added)

Not only was the coronavirus not yet a pandemic, but as of March 10 there were fewer than 200 cases in the entire developing world outside China. Pueyo had no good reason to call the coronavirus a pandemic, no good reason to believe the *entire world* would be in lockdown in two to four weeks, and, above all, no good reason to be advising world leaders to lock down.

On March 19, Pueyo posted another Medium article titled "The Hammer and Dance," which again went viral, explaining the strategy Pueyo described as "the Hammer" — quick, aggressive lockdowns when outbreaks occur — followed by "the Dance" — tracing, surveillance, and quarantine measures.[175]

On March 22, three days after Pueyo's "The Hammer and Dance" was published, a strategy paper by the German Federal Ministry of the Interior (BMI) entitled "How to get a grip on COVID-19" (later dubbed "the Panic Paper") was secretly distributed to members of German parliament and leaders of certain media outlets — this paper played an outsized role in encouraging the German government to implement a nationwide lockdown in March 2020.[176] After the BMI refused to release the Panic Paper to the public under the Freedom of Information Act, it was leaked by FragDenStaat, a whistleblower site.[177]

Despite being published just three days after Pueyo's article, the Panic Paper relied heavily on Pueyo's work, referring to the strategy of intermittent lockdowns and surveillance as the "Hammer and Dance" without citing Pueyo. The term "Hammer and Dance" has no history in epidemiology — Tomas Pueyo invented it for his March 19 article.[178]

Otto Kölbl is one of the authors of the Panic Paper.[179] Kölbl has been "researching socio-economic development in China and (comparatively) in other developing countries as well as their presentation in the Western media" since 2007.[180] From 2005 to 2006 he was a language teacher at Northwestern Polytechnical University in Xi'an, China. He now runs his own blog called "rainbowbuilders.org" in which he has described Hong Kong as "parasitic"[181] and praised China's exemplary development of Tibet.[182] Like Pueyo, Kölbl is extraordinarily unqualified to be advising world leaders on any aspect of epidemiology, infectiology, or public health, fields in which he has no background.

Maximilian Mayer is another co-author of the Panic Paper.[183] Mayer taught at the University of Nottingham in Ningbo China and Tongji University in Shanghai, and was a research fellow at Renmin University Beijing.[184] Mayer's research interests include China's foreign and energy policy, climate politics, and international relations, and he edited *Rethinking the Silk-Road: China's Belt and Road Initiative and Emerging Eurasian Relations.*[185] He has since returned to Bonn University as a junior professor of international relations.[186] Like Pueyo and Kölbl,

Mayer lacks any apparent qualification in epidemiology, infectiology, or public health, the fields on which he advised Germany's leaders via the Panic Paper.

From the earliest possible date, physicist Yaneer Bar-Yam has urged the entire world to adopt the strategy of attempting to eliminate COVID-19 entirely as China had supposedly done through the global adoption of strict social distancing measures. On February 2, Bar-Yam praised China's supposed rapid construction of a hospital: "Hospital built in days in China is now operational."[187] On February 28, Bar-Yam quoted the WHO's report from its China Joint Mission which sent the world into lockdown: "China's uncompromising and rigorous use of non-pharmaceutical measures to contain transmission of the COVID-19 virus in multiple settings provides vital lessons for the global response."[188] That same day, Bar-Yam continued "We should all acknowledge and thank China for their aggressive response to the Wuhan coronavirus. This includes stopping almost all travel of their citizens to the world to prevent contagion elsewhere."[189] In February, Bar-Yam launched the website www.endcoronavirus.org, which was soon translated into 17 languages, urging countries around the world to implement Wuhan-style lockdowns.[190]

Bar-Yam has spent the better part of a year admiring China's lockdowns — including the CCP's murderous lockdown in Xinjiang — and promoting the use of China's data despite allegations of fraud. On July 18, Bar-Yam praised China's "wartime" lockdown in Xinjiang: "17 new cases, shut the city down. Don't give it a chance. China coronavirus: 'Wartime state' declared for Urumqi in Xinjiang."[191] This same lockdown simultaneously caused incredible concern among human rights watchers and activists due to the CCP's concomitant acts of genocide in Xinjiang against Uyghur Muslims and other Turkic minorities.[192]

On March 8, Bar-Yam defended China's data, in contrast to the U.S.: "Actually, the numbers in the US are underreported because of limited testing. This is known. Many said the numbers in China are underreported, nobody has shown evidence. If you have it show it or take a seat."[193] Bar-Yam reiterated this sentiment on March 14: "Speculations about the problems in China with data are projections."[194] On March 29, Bar-Yam encouraged the U.S. to emulate China: "We need a much wider restriction. Still, China used such a strategy effectively."[195] And, on August 3, Bar-Yam congratulated China: "Successful outbreak response: China's manufacturing activity surges in July."[196]

During crises, citizens trust experts with major policy decisions. For individuals to hold themselves out to the public and their leaders as experts in a crisis when they lack the necessary qualifications is bad enough; if they are somehow cross-incentivized to do so, it's much worse.

10. Several Top National Health Officials Among the Nations Are Woefully Unqualified and Show Conspicuous Pro-China Bias

Canada's top health minister, Patty Hajdu, has no apparent background in infectiology or epidemiology, her only public health experience being in substance abuse and injury prevention.[197] Hajdu's admiration for China goes back some time — in 2014 she advised:

“Don’t believe everything you read. Chinese sunset story pure propaganda,” sharing an article arguing that stories of China broadcasting a sunset in Beijing were false.[198] Hajdu first earned the praise of Chinese foreign spokesperson Hua Chunying in early February 2020 for refusing to ban travel from China: “Canada believes the ban of entry has no basis, which is a sharp contrast for the U.S. behaviours.”[199]

In April, Hajdu defended China’s COVID-19 case data: “There is no indication the data that came out of China in terms of their death rate and infection rate was falsified in any way.”[200] When a reporter pointed out a U.S. intelligence report to the contrary, Hajdu scolded: “I would say your question is feeding into conspiracy theories that many people have been perpetuating on the internet.”[201] After that early April exchange, Hajdu was excoriated in Canada’s press for “effectively trying to gaslight her own citizens about the conduct of a habitually oppressive and untruthful regime.”[202] But Hajdu ignored that coverage and quickly doubled down just one month later, praising China’s “historic containment efforts.”[203]

Hajdu continued into September, again earning aplomb from CGTN for defending China: “very early on China alerted the World Health Organization to the emergence of a novel coronavirus and also shared the sequencing of the gene which allowed countries to be able to rapidly produce tests to be able to detect it in their own countries.”[204] For this, Chen Weihua, China Daily EU Bureau Chief, praised Hajdu: “Canadian Health Minister Hajdu is a role model. She is a disappointment to those paparazzi journalists and fearmongers.”[205]

Hajdu even earned a special nod from China’s Ministry of Foreign Affairs: “We noticed relevant reports and applaud the Canadian health minister’s objective and fair remarks.”[206]

As commentator Spencer Fernando pointed out, “Propaganda Patty … appears to be one of the only people on Earth who actually believes China’s official virus numbers.”[207] Apparently unrepentant, Hajdu again scolded a journalist questioning data, echoing her April sentiments: “Mr. Speaker, do you know what will help Canadians’ lives? If the member opposite and the leader of the opposition stop their members from sharing fake and dangerous news like the member from Lethridge and the member of Carleton stay focused on saving lives of Canadians instead of spreading conspiracy theories.”[208]

Matt Hancock is a former economist and civil servant who had little to no background in public health or natural science before becoming health secretary of the United Kingdom. Prior to COVID-19, Hancock reportedly showed little interest in his role: “For him, it’s all about promoting himself and using it as a stepping stone to his next job,” said another NHS chief. “Tech is the only area in which he’s made a mark… But his belief that tech can solve many of the NHS’s difficulties had led to him being derided by people he needs to respect him.”[209]

Hancock has been especially keen on the adoption of technology from China, meeting with Kai-Fu Lee, CEO of Chinese venture capital firm Sinovation Ventures, in January 2018.[210] (In 2019, Kai-Fu Lee became part of the World Economic Forum’s AI Council along with Imperial College President Alice Gast).[211] In September 2018, Hancock led a “British business delegation talking healthtech in China”:[212] “I’m in China this week to look at collaborating with our Chinese counterparts to harness the power of tech & innovation in healthcare.”[213]

In April 2020, China's National Health Commission reported that Hancock and his Chinese counterpart, Ma Xioawei, had spoken over the phone to discuss future collaboration during the COVID-19 crisis: "Hancock spoke highly of China's commitment to fighting COVID-19 and China-UK cooperation during the pandemic, and said that the UK is willing to enhance exchanges and collaboration with China …"[214] Three weeks later, CGTN reported that Hancock and Ma held a digital meeting of high-level health officials from China and the UK in a bid to increase cooperation amid the COVID-19 pandemic and beyond, including discussing "lockdown-lifting strategies:"

Hancock said he appreciated the cooperation so far between the two nations in their joint response to the epidemic, and expressed that the UK is willing to strengthen anti-epidemic cooperation with China and to *use the epidemic prevention and control agreements as an opportunity to deepen bilateral health and global health cooperation*… They held in-depth discussions on topics including *lockdown-lifting strategies* and reiterated their willingness to strengthen experience sharing and technical cooperation to jointly safeguard the people of the two countries.[215] (emphasis added)

During the COVID-19 crisis, Christian Drosten assumed the role of Germany's most influential health official, though as a virologist he has little background in epidemiology, infectiology, or public health.[216] Drosten's central role in creating the wildly-inaccurate COVID-19 PCR test has already been discussed. In a May 14 press conference, Drosten referred to: "this concept in the pandemic research of 'The hammer and the dance,'" but this is not true — as discussed above, the term has no history, it was invented by Tomas Pueyo on March 19.

Daniel Andrews, Premier of Victoria, Australia, employs several advisors with ties to the CCP who have been involved in his strict pandemic policies. Danny Pearson, the MP who led Andrews' Belt and Road negotiations, lauded China's handling of the coronavirus.[217] Andrews' long-time staffer, Nancy Yang, attended a course in propaganda at a high-level CCP academy and helped spread COVID-19 disinformation early in the COVID-19 crisis.[218] Both Yang and Andrews' senior advisor on China, Marty Mei, are members of the Chinese Community Council of Australia, the foremost United Front organization in Victoria.[219] Two senior figures in organizations linked to the Chinese Communist Party's foreign influence operation, Arthur Wu and Su Junxi, were chosen as COVID-19 "community ambassadors" in Andrews' government.[220]

Andrews previously signed onto Xi Jinping's Belt and Road initiative without consulting Prime Minister Scott Morrison, for which he was publicly rebuked.[221] Internal documents obtained under the freedom of information act show Andrews pitching for money and expertise from Chinese state-owned companies in his trip to China in October 2019, with a promise to "facilitate" their access to Victoria and "collaborate" on the state's biggest projects. Victoria, he said, would become "China's gateway to Australia."[222]

In August 2020, the city of Melbourne in Victoria became the first Australian city to implement Stage 4 lockdown — the strictest restrictions, with curfews and stiff fines.[223]

11. Prominent Lockdown Supporters Have Proven Unusually Indifferent to the Devastating Consequences of Their Policies

In addition to their pro-China bias, lockdown proponents have proven strangely stubborn in their support of these policies, continuing to promote economically- and socially-destructive measures seemingly without concern for their terrifying real-world consequences; tragically, these consequences are all too real.

Data from the website yelp.com has shown that over 60% of business closures during the COVID-19 crisis are now permanent, amounting to more than 97,000 businesses lost in the U.S.[224] Nearly half of black-owned small businesses have been wiped out.[225] Unemployment in the United States reached as high as 14.7% and highways jammed with thousands of vehicles awaiting their turn at food banks.[226] Nearly 5% of the population of the United Kingdom went hungry during the first three weeks of lockdown.[227]

A survey found that 22% of Canadians were experiencing high anxiety levels, a four-fold increase from before the COVID-19 crisis, while the number reporting symptoms of depression doubled to 13%.[228] More than 40 U.S. states have reported increases in opioid-related mortality.[229] And, according to the CDC, despite mass PCR testing and the enormous number of false positives, at least 100,947 excess deaths in 2020 were *not linked to COVID-19 at all*.[230]

Though at little risk from the virus itself, young people bore an outsized share of the burden of lockdown. More than seven in ten adults aged 18–23 said they experienced common symptoms of depression.[231] The CDC revealed that young adults aged 25–44 saw the largest increase in “excess” deaths from previous years, a stunning 26.5% jump,[232] despite accounting for *fewer than 3%* of deaths from COVID-19. This increase literally *surpassed* the increase in excess mortality of older Americans, who are at much higher risk of COVID-19 fatality. Since young people are at very low risk for COVID-19 fatality — 20–49-year-olds have a 99.98% chance of surviving the virus, per CDC data — this shocking increase in deaths is largely attributable to deaths of “despair,” in other words, deaths by lockdown.[233]

Suicides jumped to unprecedented levels around the world. “We’ve never seen numbers like this in such a short period of time,” said Walnut Creek’s Dr. Mike deBoisblanc. “I mean we’ve seen a year’s worth of suicide attempts in the last four weeks.”[234] “September of 2020 has been the highest month ever that we’ve seen suicidal patients admitted to our medical center,” said Dr. Kia Carter, medical director of Psychiatry at Cook Children’s Hospital.[235] In Japan, government statistics show suicide claimed more lives in October than Covid-19 has over the entire year to date.[236]

And, despite being at virtually no risk from COVID-19, as a result of lockdowns, children have suffered the most of all. Nearly one in four children living under COVID-19 lockdowns, social restrictions, and school closures are dealing with feelings of anxiety, with many at risk of lasting psychological distress.[237] In recent surveys of children and parents in the U.S., Germany,

Finland, Spain and the U.K. by Save the Children, up to 65% of the children struggled with feelings of isolation.[238]

Children's health and intellectual development has regressed. Some who were potty-trained before lockdowns have reverted to diapers, and others have forgotten basic numbers or how to use a knife and fork.[239] According to the University of Wisconsin, during the COVID-19 crisis American children over the age of ten have engaged in 50% less physical activity.[240] Achievement gaps have widened, and early literacy progress has declined.[241] Per CDC, the proportion of mental health–related emergency visits for children aged 5–11 and 12–17 years increased approximately 24% and 31%, respectively.[242] And, most horrifying of all, a study found a 1493% rise in the incidence of abusive head trauma among children during the first month of lockdown in the U.K.[243]

These are not statistics. They're friends, neighbors, and citizens, whose lives have been needlessly destroyed by government policies. But while these statistics among the Nations may be horrifying, they pale in comparison to the suffering of untold millions in the developing world, cast into starvation and poverty as a result of our lockdowns. Autocracies grew more oppressive, and democracies took on autocratic characteristics.[244] In India, millions of stranded workers lost their livelihoods and marched in exodus to far-off villages.[245] In South Africa, food lines stretched for miles.[246] Quarantined migrants in Saudi Arabia were left to die. "The guards just throw the bodies out back as if it was trash."[247]

The United Nations forewarned of a "famine of biblical proportions" with 265 million people "literally marching to the brink of starvation,"[248] and later estimated that the crisis had "pushed an additional 150 million children into multidimensional poverty — deprived of education, health, housing, nutrition, sanitation or water."[249] All this for a virus that the WHO's peer-reviewed data[250] now reveals to have an infection fatality rate of 0.23% — 0.05% in those under age 70 — and which the WHO estimates might have already infected one in ten people worldwide by October.[251]

According to the International Monetary Fund, the economy of just one G20 country grew during 2020: China.[252]

That lockdown supporters may not want to acknowledge these facts does not make them any less real. The suffering caused by these policies cannot be undone, but it can at least be prevented going forward, and justice can be obtained if these policies were imposed in bad faith.

Under the United Nations' Covenant on Civil and Political rights, it is incumbent on any government imposing disease control measures to utilize the "least restrictive means" available to effectively achieve the public health goal.[253] With the examples of Sweden, Florida, South Dakota, Belarus, and others successfully deploying means far less restrictive than China's lockdowns to manage COVID-19 — without incurring any excess mortality or results worse than lockdown areas — it is difficult to understand how any world leader can continue to impose these measures in good faith.

CONCLUSION

In the 20th century, the term *totalitarian* was born to describe certain regimes that used modern technology to control every aspect of citizens' lives, binding them to the state by breaking all pre-existing social bonds. One such regime was the Soviet Union, and there is a growing expert consensus that China today is likewise totalitarian.[254] Totalitarian regimes utilize any and all means in the pathological monopolization of power. Though they deliver an exceptionally low quality of life to their citizens, totalitarian states are advanced political organisms, punching above their weight in geopolitics with their unparalleled ability to keep secrets and execute complex operations — the archetypal example being the clandestine rearmament of Germany in the 1930s. In the wilds of geopolitics, the lion underestimates the snake at its own peril, and with lockdowns, the CCP appears to have delivered the world a hefty dose of snake oil.

Both intelligence agencies and scientists may be forgiven for overlooking the CCP's lockdown fraud. The scientific concepts involved are complex enough to elude defense officials,[255] while the geopolitical implications of China's turn toward totalitarianism are certainly convoluted enough to have deceived scientists.

Throughout 2020, lockdown measures have been quite popular, but that popularity is deceptive. For the general public, the idea that anyone might accept some outside incentive to support such devastating policies while knowing them to be ineffective — needlessly bankrupting millions of families and depriving millions of children of education and food — is, quite simply, too dark. Thus, the public supports lockdowns because the alternative — that they might have been implemented without good cause — is a possibility too evil for most to contemplate. But those who know history know that others with superficially excellent credentials have done even worse for even less.

Furthermore, most of the public believes that if there were anything untoward about the science behind lockdowns, intelligence agencies would stop them. For obvious reasons, those who work at intelligence agencies do not have the luxury of such complacency. Given the gravity of the decisions being made, we cannot ignore the possibility that the entire "science" of COVID-19 lockdowns has been a fraud of unprecedented proportion, deliberately promulgated by the Chinese Communist Party and its collaborators to impoverish the nations who implemented it.

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This letter is to be construed only as a recommendation that the above matters be investigated by law-enforcement authorities as a matter of national security. This is not a formal criminal complaint, nor are these facts necessarily indicative that any crime may have been committed by any individual named herein, a determination that can be made only by appropriate legal authorities.

Respectfully submitted this 10th day of January, 2021, by:

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File No.:

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Plaintiffs

-and-

POPE FRANCIS, *et al*
Defendants

Ontario Superior Court of Justice
Ottawa

STATEMENT OF CLAIM
Proceedings under the *Class Proceedings Act, 1992*

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